

Modern slavery and human trafficking statement to 31 March 2024

1) Introduction

This statement sets out Meridian Trust's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

As a provider of education, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Meridian Trust commits to raise awareness among our staff and students that modern slavery is a crime resulting in abhorrent abuse and violation of human rights. This takes many forms, including slavery, forced and compulsory labour and human trafficking. Meridian Trust will not condone or engage with any provider of goods or services, where we believe there may be a risk of slavery or human trafficking. The Trust is committed to preventing slavery and human trafficking in its corporate activities, and to curtail the risk with our supply chains to minimise the risk of slavery and human trafficking.

This statement covers the activities of Meridian Trust.

2) Organisational structure and Supply Chains

Meridian Trust is a multi-academy trust, committed to providing high quality and dynamic education for everyone, right in the heart of our communities. On 1st April 2022, Cambridge Meridian Academies Trust merged with Cambridge Primary Education trust to form Meridian Trust comprised of 14 Primary academies, 2 special schools and 12 secondary academies. In addition to this, a further special school the Trust in February 2023. Part of the due diligence work undertaken for new schools joining the trust includes reviewing any modern slavery risks across the schools and their supply chains.

Every child is known, equally valued and supported to achieve their potential in all our academies. Every community we serve benefits from the facilities and services we provide. Our staff benefit from strong networks, excellent career opportunities and a human approach where they are equally valued and supported.

The Meridian Board of Trustees has three key responsibilities:

- 1) ensuring clarity of vision, ethos and strategic direction of the Trust;
- 2) holding executive leaders to account for the educational performance of the schools and their pupils, and the performance management of staff;
- 3) overseeing the financial performance of the Trust and making sure that its money is well spent.

The Trustees are directors for the purposes of company law. The Trust board has six scheduled meetings per year. The board maintains a single Scheme of Delegation and delegates some powers to Policy and Scrutiny committees and Academy Councils.

Our academies have common values and core operational systems, which are applied locally, adapting to individual context and needs. Each academy has an Academy Council which provides local governance.

The Trust only operates within the United Kingdom and uses supply chains for business related maintenance contractors carrying out works within our schools, agency staff to cover teaching, agency staff to cover support staff activities, casual staff to cover seasonal activities, business related goods and services and contracted work.

The Trust has structured positive working relationships with local Trade Union representatives who are recognised and consulted with on a regular basis, including on policy formulation and review. This allows for the Trade Union representatives to follow their structured framework regarding modern slavery and helps Meridian Trust to identify modern slavery risks for the trust.

3) Relevant policies and processes

The Trust operates within the following Meridian Trust wide policies which include our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking:

- **Child Protection and Safeguarding Policy:** the Trust is committed to providing a safe and secure environment for pupils, employees, and visitors. The Trust has a Safeguarding and Child Protection policy in place. The Trust promotes a climate where pupils and adults feel confident about sharing any concerns that they may have about their own safety or the wellbeing of others. Our policy is based on the newest Department for Education Keeping Children Safe in Education (KCSIE), (September 2023 updates for the period covered by this report). This is one of the annual mandatory policies that all employees/workers/Trustees/volunteers are required to read and understand and attend training within their academies/core trust.
- **Code of Conduct:** the Trust makes clear to employees the actions and behaviour expected of them. We strive to maintain the highest standards of employee conduct and ethical behaviour as set out from the Department of Education's publication: Safer Working Practices. The Code of Conduct is issued to all employees/workers to read and understand upon appointment. Governance adheres to the Nolan Principles of Public Life and the Governance Code of Conduct is based on the National Governance Association's Code of Conduct.
- **Whistleblowing policy and procedures** The Trust encourages all its employees /workers/volunteers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form embedded within our policy. The Whistleblowing Policy is one of the annual mandatory policies that all employees/workers/governance volunteers are required to read and understand and to attend training where and as necessary.
- **Recruitment policy** The Trust is committed to using safe recruitment processes. All applicants are subjected to the rigorous recruitment procedures as outlined in KCSIE. All senior leaders and managers are encouraged to attend the safer recruitment training and all interviews must be attended by an interviewer who is fully trained as such. The importance of safeguarding and protecting children within Meridian Trust is promoted throughout the recruitment process to help deter, reject,

or identify people who might abuse children. The Trust continuously reviews the ways in which safeguarding questions are more relevant and testing to the situation. Meridian Trust undertakes all relevant statutory vetting checks including:

- Disclosure and Barring Service checks (Criminal record checks)
- barred list checks for those in regulated activity
- prohibition checks
- right to work information
- references
- No unexplained gaps in employment
- Social Media checks

Designated Safeguarding leads ensure safeguarding checks are undertaken and captured on the Single Central Record. CEO and an Executive Principal lead on safeguarding for the trust; a Designated Safeguarding Lead leads for each academy. There is also a trustee and a local Academy Council member at each school with the remit of championing safeguarding and student welfare. A thorough safeguarding quality assurance process is in place.

Meridian Trust is committed to implementing Equality Act and meeting its Public Sector Equality Duty. Meridian Trust has a Dignity at Work Policy which covers harassment and bullying. We work together with other agencies using the *Working Together to Safeguard Children* guidance.

4. Risk Assessment and Management

Risk management forms part of the day-to-day operation of the Trust. Trustees, the Chief Executive Officer (CEO) and Senior leaders of the Trust regularly identify and document the major risks to which the Trust or any academy is exposed as well as mitigation plans and actions. These risks are regularly reviewed, and mitigation plans approved by the Trust board and all its Policy & Scrutiny Committees as well as Academy Councils. The Audit & Risk Committee ensures that the framework for risk management continues to be robust as the trust continues to grow.

The Trust has an internal scrutiny programme in place and internal auditors carry out robust testing of internal controls and report back to the Audit & Risk Committee. The Trust is externally audited annually.

The priority for the Trust is the protection of pupils and employees. The Trust has robust policies and procedures in place to minimise potential risks, which are reviewed regularly and cascaded to all employees.

5. Due Diligence

The Trust is committed to ensuring, insofar as possible, that its suppliers adhere to the highest standards of ethics. Therefore, a significant proportion of our procurement is with suppliers who are appointed through means of a tender process. It has been identified that some of our procurement takes place within sectors where modern slavery and human trafficking could occur, such as within our catering supply chains, uniform supply, cleaning supply chains and the construction industry. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

During 2023-24 the Trust continued to commit to working with suppliers to ensure, insofar as possible, that they meet the standards necessary by:

- Identifying and mapping the supply chain broadly within the areas we believe are high risk of modern slavery and human trafficking and conducting supplier audits or assessments to set up a risk profile for each supplier.
- Coordinating Trust-wide procurement contracts for all schools, whereby the necessary checks will have already been assessed and documented within the contract by way of a general human rights or labour rights assessment.
- Including compliance with the Modern Slavery Act as a condition or criterion in specification and tender documents wherever possible. The contractor may be required to include equivalent clauses in their own contracts with sub-contractors (where permitted) with the aim of enabling enforcement higher up the supply chain.
- Where substandard suppliers' practices are identified, provide advice and a requirement for suppliers to implement action plans.
- Invoke sanctions against suppliers that fail to improve their practices in line with an action plan which could include the termination of the business relationship.

The Trust ensures any contractors of services to our schools provide assurances that they have carried the safer recruitment checks. This is documented electronically and updated in real time. If these assurance checks are not in place, the contractor will not be permitted to attend the school/academy/place of work.

The Trust only uses specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

6. Key Performance Indicators of Effectiveness

In addition to the processes in place outlined above, where Meridian Trust identifies potential modern slavery impacts within a contract requirement, we will work with our suppliers to develop appropriate KPIs to monitor and manage performance in regard to these risks.

7. Training

The Trust requires all employees/workers/governance volunteers to undertake Safeguarding and Child Protection, including Prevent, training. Staff and volunteers are updated regularly when KCSIE is updated annually. Staff are signposted to further training specifically on modern slavery understanding and prevention if they need a greater understanding.

The Trust plans to include modern slavery and human trafficking in our Induction Programme. covering how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our Trust;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at

unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our Trust should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from our supply chains.

8. Awareness-raising programme

As well as training employee/workers, the Trust will raise awareness of modern slavery issues by producing resources for schools to utilise and enhance employee awareness of modern slavery.

These resources will explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Trust; and
- what external help is available, for example through the Modern Slavery Helpline.

8. Board Approval

This statement was approved on 10th July 2024 by the Chair of the Board of Trustees who review and update this statement annually.

Signed: 

Name: Shirley Jamieson, Chair of Trustees