

Scholars' Education Trust

Anti-Slavery Statement

DATE OF APPROVAL: 12th February 2025

NEXT REVIEW: January 2026

Introduction

Scholars' Education Trust (SET) is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. This statement sets out the steps SET is taking, during the financial year 1 September 2024 to 31 August 2025, to understand potential modern slavery risks within its business, and to ensure that there is no slavery or human trafficking taking place in its business and its supply chains.

The Trust considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

Organisational structure and supply chains

SET is a multi-academy trust with 10 academies/schools within Hertfordshire & Bedfordshire. The trust was formed in 2012, has 9,057 students on roll and 1,200 staff.

As SET is a public funded organisation, procurement of quality goods and services has always been an important part of ensuring charitable funds are carefully spent. Supply chains utilised by SET currently include uniform, catering, grounds maintenance, cleaning, furniture and equipment, ICT hardware and construction.

SET has considered which of its supply chains could be at a high risk of slavery or human trafficking. Regard was given to supply chains which are high risk, originate outside the UK, and guidance from ISBL (Institute of School Business Leaders) which identifies high risk supply chains for schools as catering, stationery and uniform.

Due diligence

As part of SET's initiative to identify and mitigate the risk of slavery and human trafficking in supply chains, we carry out stringent due diligence on new suppliers. This includes:

- Obtaining general information on supplier companies
- Assessing supplier financial stability by reviewing recent and previous company accounts

- Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking
- Ensuring suppliers are able to provide relevant health and safety checks

Relevant policies

SET has published this Anti-Slavery Statement, which demonstrates its commitment to act ethically and with integrity in business relationships. This statement also demonstrates SET's commitment to having effective systems in place to ensure slavery and human trafficking are not taking place within its business and its supply chains.

SET's Anti-Slavery statement makes reference to other relevant and longstanding SET policies, such as its Whistle-blowing Policy, Pay Policy and Disciplinary Policy. In turn, these policies are carefully monitored and reviewed regularly. There are also internal procedures for procurement.

SET is confident that, together, these policies effectively mitigate the risk of slavery and human trafficking taking place within its business or supply chains, and provide support to staff should they have any concerns.

SET's Anti-Slavery Statement will be reviewed annually and supplemented with details of additional steps that can be taken by staff to ensure there is no slavery or human trafficking in SET's business or supply chains.

Further steps and Key Performance Indicators

SET is committed to improving its practices to ensure that its business and supply chains are free from slavery and human trafficking. Some of the additional steps that SET will consider implementing in future are:

- Enhanced due diligence, specific to slavery and human trafficking
- Enhanced due diligence on existing suppliers, rather than on new suppliers only
- Regular risk assessments on supply chains
- Staff training to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective to be carried out annually (scheduled for 2025/26)
- Proactive engagement with high-risk suppliers to obtain more detail on the entire supply chain
- Increased use of ethical suppliers
- Clauses in contracts ensuring supplier compliance with the Modern Slavery Act 2015
- Agreed key performance indicators to monitor the effectiveness of the steps taken by SET to ensure slavery and human trafficking is not taking place in SET's business or supply chains

Board approval

Scholars' Education Trust make this statement pursuant to section 54(1) of the Modern Slavery Act 2015, for its financial year ending 2024. This statement has been approved by the Scholars' Education Trust's board of directors who will review and update it annually.

Relationship to other policies

Whistle-blowing Policy, Staff Pay & Performance Policy and Disciplinary procedures



Equalities impact assessment considered