

Astrea Academy Trust – Modern Slavery Statement 2021/22

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’.

Trustees of Astrea will not tolerate modern slavery and encourage all those employed by the Trust, or associated with it, to take a proactive approach to tackling this type of crime. Trustees have not had cause to believe that modern slavery practices have occurred within the Trust or within its supply chains, but remain keenly aware of the need for continued vigilance.

1. Structure and supply chains

Astrea Academy Trust is a multi-academy trust comprising a range of primary, secondary, all-through, special schools and nurseries in Cambridgeshire and South Yorkshire. It is a single legal entity and an exempt charity, whose financial year ends on 31st August. Astrea came in scope for the Section 54 obligation to publish a Modern Slavery Statement at the end of academy financial year 2017/18.

The Trust’s main business operations are in the provision of education. It is supported by a large number of suppliers of various sizes, the vast majority of which are entirely UK-based.

2. Policies on modern slavery

Trustees have not deemed it necessary to produce a free-standing policy on modern slavery. Instead, this statement is shared with Executive Directors, the Deputy Director (Safeguarding) and the Heads of Finance, Estates and HR in order to ensure that relevant policies have regard to Astrea’s duties under the Modern Slavery Act 2015.

3. Due diligence processes

Extensive due diligence activities take place at schools that are due to join the Trust. Detailed HR and contracts information is gathered as part of this and any irregularity is challenged prior to conversion, then addressed upon conversion if it is outstanding.

As below (*‘Actions taken by the Trust’*), Astrea is making increasing use of consolidated contractual arrangements with larger providers who have their own statements and policies in relation to modern slavery. This will make due diligence in relation to contractors more transparent and efficient.

4. Risk assessment

Trustees continue to deem the risk of systemic modern slavery within the Trust itself to be **very low**. This is because recruitment to the Trust takes place within a highly-professional framework and employees and many volunteers are subject to legal checks, including Right to Work and DBS. Trustees are, however, clear that even one instance of modern slavery is one too many and are clear on the need to maintain vigilance.

Trustees deem the risk of systemic modern slavery within the Trust’s supply chains to be **low**. This is because procurement processes are such that reputable firms are contracted and, where cost-effective, larger contractors with their own modern slavery statements or policies are used. Similarly, the Trust makes extensive use of services provided by Local

Authorities. Nevertheless, the Trust considers that this risk might increase in the coming year as the economic impact of the COVID-19 pandemic makes people more susceptible to the insecure, low-paid work that exists at the borderline with modern slavery.

Trustees have, however, had regard to sectoral risks and have identified the following supply chains as requiring enhanced assurances because they are more likely to make use of temporary workers sourced through an intermediary or employment agency:

- **Capital works** – for high-value works, the Trust contracts large firms who have greater ability to provide the service and who are more likely to have their own policies in place in respect of modern slavery.
- **School uniforms** – a review of providers' policies in respect of modern slavery will take place in 2022. This was due in 2021, but was delayed due to ongoing COVID-19 impact.
- **Catering** – in 2019, the Trust moved towards a single, larger provider of catering services in most of its South Yorkshire primary schools. The provider's approach to modern slavery has been reviewed and Trustees are satisfied that this properly addresses supply chain risks. The Modern Slavery statements for the Trust's largest catering providers have been obtained and the Trust is satisfied with these. Further work will be undertaken in 2022 to assess the level of risk in the remaining catering contracts; this work has been deferred from 2021 to coincide with re-tendering processes.
- **Estates management (including cleaning)** – two-thirds of these services are directly employed by the Trust. Additional assurances will be sought in relation to outstanding contractors in 2022; this work has been deferred from 2021 due to COVID-19 impact.

5. Measuring effectiveness

The People and Remuneration Committee of Trustees has asked for an annual report to be provided alongside the draft modern slavery statement for the relevant year. This report will include progress in mitigating risks and on training of staff.

6. Training for staff

All school staff and central colleagues have received training in Part 1 of Keeping Children Safe in Education 2021, which includes reference to child criminal exploitation. Staff did not receive dedicated training in modern slavery in 2017/18 and Trustees asked the executive to consider and report back on how to provide this in 2019/20. Based on the recommendation of the Deputy Director (Safeguarding) and the Head of Governance, Trustees have endorsed the promotion of video information to all staff in the Trust and additional guidance given to Designated Safeguarding Leads at each academy. In 2021/22, the Trust subscribed to the Educare training package for all staff and non-executives – this package includes a dedicated Modern Slavery module.

7. Actions taken by the Trust

- In 2017/18, the HR committee of Trustees approved a new Recruitment Policy, which strengthened the Trust's approach to recruitment.
- In 2017/18, the Executive Board approved and published a Trust-wide whistleblowing policy to promote each person's duty to raise concerns of wrongdoing and criminality. Incidents of whistleblowing are reported to the HR Committee.
- The Education, Inclusion and Safeguarding Committee approved a Trust-wide Safeguarding Policy, which contains specific reference to child criminal exploitation and modern slavery.

- The Finance, Risk and Audit Committee has asked that a Procurement Policy be implemented in 2019/20, covering ethical procurement practices. This activity has been deferred to 2021/22.
- Astrea continues to move towards Trust-wide contracts with large, established firms, many of which have their own statements or policies on modern slavery. This includes legal services, catering, supply staffing and all high-value capital contracts.

This statement was agreed by Trustees on 17th November 2021. It will be updated and re-issued before 31st December, 2022.