



— **ST THOMAS** —  
**AQUINAS**

**CATHOLIC MULTI-ACADEMY TRUST**

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**Modern Slavery Act Statement**

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## **I INTRODUCTION**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers and can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

St Thomas Aquinas Catholic Multi-Academy Trust (“the Trust”) is committed to the highest standards of ethical conduct. This includes a commitment to prevent and eliminate any form of modern slavery and/or human trafficking in its business activities and its supply chain.

This statement sets out the steps the Trust has taken, during the **financial year ending 31st August 2022** to address the risk of modern slavery within our business activities and the steps the Trust will take, to combat modern slavery and human trafficking to address the requirements of the Modern Slavery Act (2015).

## **2 OUR ORGANISATIONAL STRUCTURE**

St Thomas Aquinas is a Catholic Multi-Academy Trust was founded in 2018 under the Diocese of Nottingham and brings together 23 schools (19 Primary & 4 Secondary) across Leicester and Leicestershire and has approximately 1400 employees.

The Trust is committed to providing the very best Catholic education and aims for its pupils and students to be happy, safe and inspired to flourish spiritually, socially and academically.

## **3 COUNTRIES OF OPERATION**

The Trust only operate within England and our contractors and suppliers are predominantly UK based.

## **4 RISK MANAGEMENT**

Risk management is embedded in the day-to-day practice within the St Thomas Aquinas Catholic Multi-Academy Trust. Potential risks have been identified and documented and are reviewed regularly by the CEO, Directors’ Audit & Risk Committee and the Executive Team as a whole to ensure continuous compliance and improvement. The Trust is committed to ensuring the safety of pupils, students and employees and has in place appropriate strategies, policies and procedure to help mitigate against risk.

We are confident that, by working together with our suppliers, we can aim to ensure that they adhere to the same high standards in the prevention of slavery and human trafficking.

## **5 OUR SUPPLY CHAINS**

The Trust's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware, construction, consultancies and recruitment agencies. The Trust works predominately with UK based suppliers and contractors whose employees are protected under UK

employment law, although the Trust does not conduct business in countries where there is active human trafficking and / or modern slavery, the Trust is aware of the need to ensure that companies within our supply chain share our commitment to treat their employees in a fair and ethical way.

We continue to purchase goods, services, and works in accordance with the Academies Trust Handbook, which ensures compliance with current legislation and procurement best practice. Across our organisation we work with a preferred supplier list of specified, reputable employment agencies for classroom-based supply.

## 6 TRUST POLICIES

The Trust has the following policies which promote anti-slavery and human trafficking practices

- **Financial Regulations** – Provides a framework of governance and steps to ensure all procurement activity is compliant to legislation and best practice including transparency of our supply base.
- **Child Protection Policy and Safeguarding** – The aim is to provide a safe and secure environment for Children and provides a framework of our Schools to identify and support students who are at risk of modern slavery, trafficking, or exploitation.

This legal requirement together with the Catholic values and principles that underpin the St Thomas Aquinas Catholic Multi-Academy Trust mean that it is essential that the CMAT ensures not only compliance at local level but also assumes a strategic responsibility to ensure that safeguarding practices are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

The Trust's Safeguarding Director leads on safeguarding within the Trust. All schools have a Designated Safeguarding Lead and a Safeguarding Governor. Safeguarding is reported on at every Local Governing Body meeting, every Directors' meeting, and every Core Executive Board meeting.

The Trust follows each local authority's safeguarding procedures set up by the Local Safeguarding Children Board (LSCB). Child Protection & Safeguarding policies are based on the Department for Education publication "Keeping Children Safe in Education" and all employees are required to have read and understood this document as well as to undertake annual Safeguarding refresher training.

- **Whistleblowing Policy** – This policy provides a mechanism for encouraging employees to report concerns about potential wrongdoings, including modern slavery risks, without fear of reprisals, victimisation, or subsequent discrimination. It is intended to encourage and enable employees to raise serious concerns within the Trust. It is recognised that cases may have to proceed on a confidential basis.

## 7 CULTURE AND TRAINING

We are committed to promoting a culture of awareness amongst staff and stakeholders, by using both trust-wide staff briefings to relay any significant changes to key legislation – including safer recruitment in line with the latest edition of Keeping Children Safe in Education statutory guidance.

## **8 ACTIONS TAKEN THIS FINANCIAL YEAR**

- Implementation of a Trust-wide Employee Code of Conduct policy and procedure
- Refresher training has been delivered to all staff on modern slavery, within the context of Child Criminal Exploitation, Child Sexual Exploitation and Human Trafficking as well as being an integral part of the statutory safeguarding and prevent training that is required of all staff
- Ongoing: Centralisation of Finance and HR Services allowing data to be accessed centrally
- Ongoing: Trust-wide Risk Register in place and reviewed regularly by CEO/Audit & Risk Committee/Executive Board
- Ongoing: Centralised procurement of high-risk contracts to limit risk and exposure to suppliers and contractors operating outside of this policy
- Ongoing: As part of our recruitment processes, safer recruitment procedures are in place

## **NEXT STEPS**

- To continue raising awareness across the organisation via internal communication channels by publishing a full copy of the Modern Slavery Act on the Trust's SharePoint site, to ensure it is accessible to all Designated Safeguarding leads, Executives and Board
- Update policies and contract to include modern slavery statement