



Modern Slavery Statement

TPAT Policy Management

Document history

Review date	Version	Reviewer / owner	Executive approval	Approving body	Meeting date of policy approval
11/2023	1	DFO and Deputy CEO	11/2023	Trust Board	04/12/2023
11/2024	2	CEO CFO	26/11/2023	Trust Board	09/12/2024

Material changes since last publication

Section	Changes
Version 2 3.	Suppliers are primarily UK based and key supply areas cover include catering, maintenance / repairs, agency staff and cleaning
Version 2 8.	Safeguarding leads, in the schools included for clarity

This statement is reviewed annually. The next review is due by December 2025.

1. Introduction and Aims

Modern slavery remains a crime that affects millions of individuals around the world. The Modern Slavery Act 2015 defines these offences as those of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. The Trust is committed to ensuring that modern slavery is not tolerated and encourages all those employed by it, or associated with it, to take a proactive approach to tackling this type of crime. Trustees have no 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.

- This statement aims to set out how The Park Academies Trust (TPAT) expects to comply with the Modern Slavery Act 2015 and to ensure that any other organisation associated with it does too.

1.1 Relevant legislation and guidance

This policy refers to, and complies with, the following legislation and guidance:

- The Modern Slavery Act 2015

1.2 Other Linked Policies

The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Anti-Bribery and Corruption Policy
- Procurement Policy
- Whistleblowing Policy and Procedure
- Safeguarding and Child Protection Policy
- Supplier terms and conditions

2. The Park Academies Trust Modern Slavery Statement

This statement is made on behalf of TPAT in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes TPAT's slavery and human trafficking statement. It relates to actions and activities between September 2023 and August 2024.

TPAT recognises that it has a responsibility to take a robust approach to slavery and human trafficking. TPAT is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out TPAT'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 business and supply chains.

3. Structure, business, and supply chains

TPAT is a multi-academy trust (MAT). The list of our schools can be found on TPAT's website.

TPAT has two main areas of operations:

- A central level which oversees the whole organisation, and;
- A local level – individual academies.

TPAT's suppliers are primarily UK based and key supply areas include catering, maintenance / repairs, agency staff and cleaning.

4. The Trust's approach

TPAT works to the highest professional standards and complies with all laws, regulations, and rules relevant to our organisation. TPAT expects the same high standards from everyone that it works with and is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of our business. TPAT acts ethically and with integrity in all of its charitable and business relations.

5. Policies, documentation, and key relationships

The following key policies and documentation detail TPAT's approach to protecting pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Anti-Bribery and Corruption Policy
- Procurement Policy
- Whistleblowing Policy and Procedure
- Safeguarding and Child Protection Policy
- Supplier terms and conditions

TPAT's Finance, Risk and Audit Committee (FRAC) has overall oversight of the process and practices embedded within TPAT to reduce modern slavery and in ensuring our supply chains can demonstrate adherence with local and national laws and regulations.

6. Identifying and addressing risks

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact TPAT.

The first is through matters of a safeguarding nature which covers child sexual exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors.

The second is our supply chain for goods and services.

7. Supply chain

TPAT's suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS (Disclosure and Barring Service) check. Should suppliers fail to meet TPAT's minimum requirements, or be unwilling to make any changes, we will cease to trade with them as soon as we are aware of an issue.

Procurement is subject to internal and external audit review. Frameworks via public sector buying organisations are considered for all tenders and these meet the requirements of the Modern Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders are reviewed by the DFO\CFO at which point the modern slavery risk is considered and incorporated into the tender evaluation criteria.

We have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the Act. No areas of risk were identified. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking, and fully understand our duty as a Trust as prescribed in legislation namely in the form of e-learning. Safeguarding colleagues also cover modern slavery within their CPD programme.

8. Safeguarding

TPAT takes safeguarding very seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. Collectively safeguarding leads in the schools work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are incredibly experienced in this area and model excellent practice for all staff. Through their encouragement, each academy proactively works with the local authorities, the local safeguarding partnerships, and the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared amongst the academies and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is independently audited and reported to the executive and trustees.

Our TPAT Safeguarding and Child Protection Statement is reviewed annually by the Executive Board and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE 2024).

9. Training

Every member of staff, whether or not they are based in an academy, is trained on the policy (either in person or via e-learning) and is required to declare annually that they

have read and understood the policy and their training. In addition, TPAT also has a Whistleblowing Policy and Procedure which enables those with concerns about any wrongdoing or breaches of law to raise these concerns in confidence without fear of disciplinary action.

Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus on early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training, staff could identify and act appropriately for at risk pupils, staff, and contractors.

This is not an area for complacency and we keep under close scrutiny and evaluation our safeguarding policy and practice. This enables us to refine and develop excellence in all we do. Safeguarding awareness sessions for modern slavery (and trafficking) at academy level are included within our staff safeguarding CPD plan.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our estates.

10. Actions taken by the Trust

To date, no referrals have been made in relation to modern slavery.

Annually the Trustees approve the Whistleblowing Policy and Procedure to promote each person's duty to raise concerns of wrongdoing and criminality. Incidents of whistleblowing are routinely reported to the Finance, Risk and Audit Committee.

The Procurement Policy is being updated to specifically cover ethical procurement practices and compliance with the Modern Slavery Act 2015.

The Trust 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 cleaning, catering, supply staffing and all high value capital contracts.