



AVANTI SCHOOLS TRUST

## Modern Slavery Statement



Autumn 2024

*Review date: Autumn 2026*

# MODERN SLAVERY STATEMENT

This Policy is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	Autumn 2024
This policy must be reviewed by no later than*: <i>*this refers to the term in which the Policy must be reviewed by the appropriate Committee for recommendation to the Board.</i>	Summer 2026
Policy Author(s):	Head of People
Date policy reviewed by Committee and Minute reference	People and Governance Committee: 13 <sup>th</sup> November 2024 (Minute Reference 26)
Date Policy approved by the Trust Board and Minute reference	11 <sup>th</sup> December 2024 (Minute Reference 37)
Location of publication of policy:	Governor Hub/ AST Website/ Internal Records and Intranet

## **AST Modern Slavery Statement**

**October 2024**

This statement is made on behalf of the Avanti Schools Trust (AST) (company number 07506598) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the year September 2024 to August 2025.

AST recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation 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 AST's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its business and supply chains.

### **Structure, business and supply chains**

AST is a multi-academy trust (MAT), working within some of the most economically deprived areas of the country. The list of our academies can be found on the AST website.

AST has two main areas of operations:

- A national level - which oversees the business as a whole,
- A local level - an individual academy.

Our suppliers are UK based and our supply chain include:

- |                                     |                              |
|-------------------------------------|------------------------------|
| • Audit                             | • Insurance                  |
| • Catering                          | • Licenses and subscriptions |
| • Corporate costs                   | • School Uniform             |
| • Marketing and advertising         | • Staff development          |
| • Music services                    | • Staff expenses             |
| • Printing postage and stationery   | • Support staff costs        |
| • Recruitment                       | • Technology costs           |
| • Educational consultancy           | • Telephony                  |
| • Educational Supplies              | • Utilities                  |
| • Educational visits                |                              |
| • Estates and facilities management |                              |
| • Hire of equipment                 |                              |

## **Our approach**

We work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we work with. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

## **Policies, documentation and key relationships**

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

- Financial Controls Policy,
- Complaints Policy,
- Whistleblowing Policy,
- Single Central Record (SCR), Staff Files and Safer Recruitment Policy,
- Child Protections and Safeguarding Policy,
- Colleague Code of Conduct.

Our People and Governance Committee (PGC) has overall oversight of the process and practices embedded within AST to reduce Modern Slavery and in ensuring our supply chains, which rely on people, can demonstrate adherence with local and national laws and regulations, including paying the living wage.

## **Identifying and addressing risks**

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact AST. The first is through matters of a safeguarding nature which covers child sex 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 and the vendors we contract.

## **Supply chain**

AST's Financial Controls policy set out the requirements we have in relation to procurement. Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the living wage, and any on-site staff passing a DBS (Disclosure & Barring Service) check. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. 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 go through the Head of Business Services at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

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. All staff receive CPD on modern slavery, namely in the form of e-learning. Safeguarding colleagues also cover modern slavery within their CPD programme.

## **Recruitment**

The Trust conducts all its recruitment processes in line with its Child Protection and Safeguarding Policy and Safer Recruitment Policy, which lays out stringent processes for recruiting staff, and thoroughly checking that they are legally entitled to work in the UK.

## **Safeguarding**

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. Safeguarding is led by through Designated Safeguarding Leads in every academy, supported by a third-party specialist safeguarding services provider, and is overseen by the Executive Team.

These colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust, alongside all AST colleagues. 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, 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 reviewed at every level of Trust governance. Safeguarding policy and practice are reviewed at School Review Meetings, through third-party provided safeguarding audits, and progress is regularly reviewed through our Executive Safeguarding Oversight Group (ESOG).

Statutory safeguarding practices and impact on keeping children safe are formally reviewed by our third-party safeguarding specialist provider, and audits are assured through our ESOG. This is also quality assured by the National Director of Attendance, Behaviour and Safeguarding. We have a named Trustee with portfolio responsibility for safeguarding. This Trustee is also the Chair of our Audit and Risk Committee.

Our AST Child Protection and Safeguarding Policy is reviewed annually by the Executive Leadership Team and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education. Each school Designated Safeguarding Lead is required to understand the local safeguarding context. This is included within the policy for each academy and published on each academy website.

## **Training**

Every member of staff, whether or not they are based in an academy, is trained on the relevant policies (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, AST also has a Whistleblowing Policy 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 upon 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 that staff could identify and act appropriately for at risk pupils, staff, and contractors.

AST keeps safeguarding policy and practice under close scrutiny and evaluation. This enables AST to refine and develop excellence in safeguarding. 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 and modern slavery which are available to all users of our estates.

### **Goals and key performance indicators**

The Trust is committed to continually reviewing and improving its practices to ensure modern slavery is in no way a part of its operations. Over the next financial year, we are looking to implement the following control measures to increase our oversight of ethical procurement and recruitment:

- Delivering statutory training
- Best practice HR in recruitment
- Best practice procurement
- Optimizing the use of Public Sector Buying Organisations
- Improving supplier performance management

### **Reporting**

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

*Signed: Nitesh Gor, Accounting officer of AST*

*Approved by the Board of Trustees on 11.12.24*