



**Excalibur Academies Trust**  
Modern Slavery and  
Human Trafficking Statement 25-26

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## **1. Introduction**

- 1.1 This statement sets out Excalibur Academies Trust's actions to understand all potential modern slavery risks related to its business and the steps we take to ensure there is no slavery or human trafficking in our business and supply chains.
- 1.2 We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our organisation and supply chain. We all have a responsibility to be alert to the risks. All staff are expected to report concerns and managers to act on them. This statement applies to everyone working for or with Excalibur Academies Trust, including our supply chain, contractors, employees, volunteers and all other business partners.

## **2. Organisational Structure**

- 2.1 Excalibur Academies Trust is a Multi-Academy Trust. Our principal activity is the provision of primary and secondary education in 20 academies.

## **3. Our Business**

- 3.1 Through our family of schools we provide human resources, financial services, specialist advice and guidance support for schools including Health & Safety, SEND & Inclusion, Governance and GDPR.

## **4. Our Approach**

- 4.1 Excalibur Academies Trust has zero-tolerance of any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and expect our supply chain, contractors, employees, volunteers and all other business partners to do the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

## **5. Our policies, documentation, and key relationships**

- 5.1 The following policies and documents detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery. These include:
  - 5.1.1 Employment Manual - sets out our expectations for employee behaviour.
  - 5.1.2 Equality, Diversity and Inclusion Policy;
  - 5.1.3 Child Protection and Safeguarding Policy;
  - 5.1.4 Safer Recruitment Guidance;
  - 5.1.5 Whistleblowing Policy – we encourage all employees, volunteers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation;
  - 5.1.6 Supplier review through contract and Terms and Conditions.
- 5.2 Our Staffing and Finance Committees have oversight of our practices to prevent Modern Slavery from entering our supply chains, and to ensure adherence with employment laws and regulations, including paying the minimum wage.



## **6. Identifying and addressing risks**

- 6.1 We recognise there are two main areas of risk through which modern slavery could impact the Trust. The first is through child sexual exploitation or human trafficking which can directly impact our pupils, staff, or contractors. This also potentially affects the staff of our contractors. The second is through our supply chain.

## **7. Procurement and supply chain**

- 7.1 We are committed to transparency in our business, and to ensuring our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same standards from our contractors, suppliers, and business partners. We are evolving our procurement and contracting processes to include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same standards.
- 7.2 Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act, we will endeavour to eliminate the risks as much as possible. We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act. Department for Education (DfE) Approved Supplier Frameworks are also used when suitable, to tender only with suppliers which have been pre-vetted/approved by the DfE.

## **8. Safeguarding & Staff Training**

- 8.1 Modern Slavery and trafficking are both forms of abuse and therefore fall within our safeguarding policies and procedures.
- 8.2 All employees undertake Safeguarding and Child Protection training which includes understanding of modern slavery. Employees are individually responsible for ensuring they are familiar with the signs and indicators of modern slavery and that they are aware of our safeguarding policies and procedures so that they can respond appropriately. Line managers must ensure that safeguarding training is kept up to date.
- 8.3 All Trustees undertake Safeguarding and Child Protection training in line with our requirements set out in our Safeguarding Handbook. This also applies to Governors and volunteers at our academies.
- 8.4 Our whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law to raise these concerns without fear of disciplinary action.

## **9. Our Supply Chains**

- 9.1 We have a zero tolerance to slavery and human trafficking and expect all those in our supply chain and contractors to comply with our values.
- 9.2 We require all suppliers to attest that:
- 9.2.1 they don't use any form of forced, compulsory or slave labour;
  - 9.2.2 their employees work voluntarily and are entitled to leave work;



- 9.2.3 they provide each employee with an employment contract that contains a reasonable notice period for terminating their employment;
- 9.2.4 they don't require employees to post a deposit/bond and don't withhold their salaries for any reasons;
- 9.2.5 they don't require employees to surrender their passports or work permits as a condition of employment;

**10. Key performance indicators to measure effectiveness of steps being taken**

- 10.1 Pre-employment checks will be completed for 100% of new staff prior to commencement of employment. This includes KCSIE, DBS/Safeguarding, and Right to Work in the UK checks.
- 10.2 The Financial Scheme of Delegation will be followed to ensure appropriate scrutiny of contractors and tender processes.