



Anti-slavery and Human Trafficking Statement

March 2019

1. Introduction

- 1.1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Summit Learning Trust's slavery and human trafficking statement for the financial year ending 31 March 2019.
- 1.2. Summit Learning Trust is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Trust is taking (and intends to take) to avoid the risk of modern slavery occurring within its services.

2. Organisational Structure

- 2.1 Summit Learning Trust is a multi-academy trust that employs approximately 900 staff, operating in the United Kingdom. Its core business is teaching a pupil population of approximately 7.650.
- 2.2 The Academy Trust has an annual turnover of £45.4m of which approximately £11.5m is spent on good and services to support the running of the Trust.

3. Due diligence processes

- 3.1. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of its services, the Trust will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.
- 3.2. The Trust has in place systems to:
 - Identify and assess the potential risk areas in our supply chains.
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
 - Monitor potential risk areas in our supply chains.
 - Protect whistle blowers.
- 3.3. The Trust identifies the following as the principal areas of potential risk:
 - Our sourced contractors
 - Supply chains
 - Cleaning and Catering suppliers
 - Recruitment agencies
 - Teacher supply agencies

4. Supply chains

- 4.1. In its supply chains, the Trust has identified the following business areas as carrying material risks of modern slavery occurring:
 - Estates
 - Procurement
 - Catering services
 - Cleaning services
 - I.T. office equipment
- 4.2. When procuring any types of goods or services, the Trust requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.3. Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the Trust's own policies and procedures, will be removed from the Trust's list of suppliers and will not

be considered for future supply to the Trust unless they can demonstrate that these compliance requirements are met.

4.4. In terms of future steps, the Trust will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products

5. Raising Awareness

5.1 All staff will be briefed on the Anti-Slavery and Human Trafficking Statement to raise awareness, along with any regular staffing updates as we develop our Statement and practices.

6. Recruitment practices

6.1. Temporary staff and staff recruited indirectly by the Trust are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the Trust conducts checks on such agencies before they are approved.

6.2. Through its recruitment processes, the Trust ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

7. Trust policies

7.1. The Trust already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Trust business. The Trust operates the following policies:

- Grievance and Whistleblowing policies – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
- Employee Code of Conduct – this code sets out the actions and behaviour expected of them whilst employed by the Trust. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- Fraud policy – the Trust is committed to the highest standards of ethical conduct and integrity in its business activities. The Trust will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.
- Procurement policy – this policy reflects the Trust's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.
- Utilise OJEU (Official Journal of the European Union) compliant Frameworks where appropriate on outsourced services including Catering, Cleaning and Agency Recruitment.
- Trust Standard Terms and Conditions of Purchase – risks of modern slavery covered within Section 13.1

8. Performance indicators

8.1 Where the Trust has identified risks of modern slavery occurring in any part of its services, it will aim to introduce key performance indicators (KPIs) to measure progress against reducing such risks. The Trust will consider setting and reviewing KPIs in the following contexts:

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
- training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action
- oversight of third party suppliers of relevant goods and services supply chains]

8.2 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

8.3 Having assessed the training needs for staff operating in different parts of the Trust, we will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

This statement will be reviewed by the Board of Trustees in May 2019 and then on an annual basis.

Summit Learning Trust