

Modern Slavery Statement

Approval date: 18 October 2023
Approved by: Board of Trustees



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1. Introduction

1.1 Exceed Academies Trust, a registered charity and company limited by guarantee, is headquartered in Bradford, West Yorkshire. Our guiding principle is centred on improving the outcomes and life opportunities for our learners while positively impacting the communities we serve. This statement is published in accordance with Part 6, Section 54 of the Modern Slavery Act 2015. It outlines the proactive measures taken by Exceed Academies Trust and our affiliated schools/academies during the year ending 31 August 2023 to prevent modern slavery and human trafficking in our supply chains and all facets of our operations.

2. Organisation

- 2.1 Exceed Academies Trust is an expanding organisation, presently comprising 13 schools/ academies that collectively provide education to over 5000 children and young people spanning primary, secondary, special, and alternative provision settings. In addition to our schools/academies, the Trust operates a school-centred initial teacher training (SCITT) facility and is responsible for the Teaching School Hub, including Appropriate Body services, for Bradford and our partners.
- 2.2 Our workforce comprises around 970 individuals, and our recruitment processes are meticulously designed to ensure that prospective employees are both legally entitled to work in the UK and shielded from any form of abuse or coercion after joining the Trust.
- 2.3 We acknowledge that modern slavery can manifest in two primary ways within our organisation:
 - **Safeguarding Practices:** Our commitment to safeguarding extends to child sex exploitation and human trafficking, which can directly impact our learners.
 - **Supply Chain:** We recognise the risk associated with modern slavery within our supply chain, encompassing contractors and vendors.

3. Supply Chain

- 3.1 Procurement of goods and services is managed at both Trust and school levels, with oversight provided by the Trust's Central Team. Our supply chain is extensive, primarily sourcing goods and services from reputable UK suppliers. These encompass construction services and supplies, furniture and stationery, electronics (computers, audiovisual, etc.), food and catering supplies, travel services, laboratory supplies (equipment, chemicals, etc.), books, cleaning services, printing, waste, and recycling services. All procurement activities strictly adhere to public procurement law and Trust financial regulations.
- 3.2 We have mandated that all suppliers to the Trust must fully comply with the requirements of the Modern Slavery Act 2015. The Trust retains the right to exclude any bidder, contractor, or service provider convicted of an offense under the Modern Slavery Act 2015.
- 3.3 Whenever possible, the Trust endeavours to establish Trust-wide contracts for our schools in partnership with well-established firms, many of which maintain their own statements or policies concerning modern slavery and trafficking. This applies to contracts related to cleaning, catering, supply staffing, and high-value capital contracts.



4. Policies

- 4.1 Exceed Academies Trust conducts periodic reviews of its policies and procedures to ensure alignment with the evolving needs of the Trust, our schools/academies, and our staff, pupils, young people, and the communities we serve. These policies serve as effective safeguards against the risk of slavery and human trafficking occurring within our business or supply chains and provide guidance and support to our staff.
- 4.2 Our key policies designed to combat modern slavery and human trafficking under the Act include:
 - Complaints Policy and Procedure
 - Equality Statement, Policy, and Objectives
 - Financial Procedures and Scheme of Financial Delegation
 - Gifts & Hospitality Policy
 - Investment Policy
 - Recruitment Policy
 - Tendering and Procurement Policy
 - Whistleblowing Policy
 - Safeguarding and Child Protection Policies.

5. Due Diligence and Risk

- 5.1 The Trust follows due diligence processes when procuring goods and services, ensuring alignment with the Public Contract Regulations 2015. Additional scrutiny is applied when assessing a higher risk of human trafficking or slavery.
- 5.2 Our risk assessment for modern slavery and human trafficking is as follows:

High risk activities

• We do not believe there to be any high-risk operations within the Trust or within our supply chain with regards to modern slavery and human trafficking.

Medium risk activities

- Supply chains linked to the catering and cleaning provisions as a consequence of the use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

Low risk activities

- Provision of agency staff predominantly in teaching and support roles.
- 5.3 Compliance with the Modern Slavery Act is a mandatory requirement within the specifications of all tenders for the supply of goods and services.



6. Training for Staff

- 6.1 Exceed Academies Trust ensures that all Trust and school/academy staff undergo annual safeguarding training, which includes reference to modern slavery, trafficking, and sexual or criminal exploitation.
- 6.2 Additional training is identified for those managing contracts related to outsourced activities to ensure appropriate monitoring of suppliers.

7. Accountability

- 7.1 The Board of Trustees bears ultimate responsibility for ensuring that this statement complies with our legal and ethical obligations. This responsibility extends to all parties working with or on behalf of the Trust.
- 7.2 Within our schools/academies, the Headteachers and the Local Advisory Boards are responsible for enforcing compliance with this statement concerning any parties working with or on behalf of the respective school/academy. Similarly, at Exceed Academies Trust Head Office, the Central Team shares this responsibility in relation to the statement.
- 7.3 Each employee is individually responsible for promptly notifying their line manager should they become aware of any activities, whether within the Trust or involving external suppliers or partners, that are not compliant with this statement.

