



**Shaw
Education
Trust**

Modern Slavery Statement

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Introduction

1. Introduction

Modern slavery is a heinous crime and a severe violation of fundamental human rights. It manifests in various forms, including slavery, servitude, forced and compulsory labour, and human trafficking. All these forms share the common characteristic of depriving an individual of their liberty for the purpose of exploitation, whether for personal or commercial gain. Shaw Education Trust (SET) is committed to taking robust measures to ensure that modern slavery and human trafficking do not occur within our operations or our supply chains. This policy outlines the actions we have taken and the strategies we are implementing to safeguard against these abuses.

2. Organisational Structure and Supply Chains

Shaw Education Trust operates multiple academies and educational institutions across the UK, providing education and support services to young people. Our operations involve engaging with a wide range of suppliers and contractors, including those in sectors that have been identified as high-risk for modern slavery, such as construction, uniform supply, and catering. We recognise the importance of being vigilant in these areas and are committed to working with ethical suppliers who adhere to the principles of the Modern Slavery Act 2015.

3. Risk Management

3.1 Identification of Risks

The Trustees and Senior Executives of SET have formally identified and documented the major risks to which the Trust is exposed, including the risk of modern slavery and human trafficking within our supply chains and operations. These risks have been thoroughly reviewed by the Audit Committee, and risk management strategies have been developed to address them.

3.2 Embedded Risk Management

Risk management is an integral part of our day-to-day processes. We have implemented a risk management framework that includes regular assessment and monitoring of risks related to modern slavery. This

ensures that any potential risks are identified early and that appropriate actions are taken to mitigate them.

3.3 Internal Audits and Compliance

Our internal auditor conducts regular testing of internal procedures and controls, including adherence to policies and procedures relevant to modern slavery. Any non-compliance is reported to senior management and the Audit Committee. Additionally, our whistleblowing policy empowers employees to report any suspicions or evidence of modern slavery, with the assurance that these reports will be investigated thoroughly and confidentially.

4. Child Protection and Safeguarding Policy

4.1 Safeguarding Focus

SET has comprehensive Safeguarding and Child Protection policies in place, designed to ensure the safety and well-being of all pupils. These policies provide a robust framework for our schools to develop secure processes for identifying and supporting pupils at risk of abuse, including those who may be victims of modern slavery and human trafficking.

4.2 Training and Awareness

Headteachers, along with Designated Safeguarding Leads, are responsible for ensuring that all staff and governors receive annual safeguarding training. This training includes up-to-date information on various forms of neglect and abuse, with specific emphasis on identifying and responding to signs of trafficking and modern slavery among pupils. We ensure that our schools have mechanisms in place for children to voice their concerns and that these concerns are taken seriously.

4.3 Monitoring and Reporting

Schools are required to monitor and investigate persistent absences, as this may be an indicator of underlying issues such as trafficking. Any concerns related to modern slavery are escalated according to our safeguarding protocols, ensuring that timely and appropriate actions are taken.

5. HR Policies

5.1 Workplace Integrity and Ethics

SET is committed to maintaining a workplace environment that upholds the highest standards of integrity and ethics. We expect all colleagues to act with integrity and to contribute to a culture of openness, honesty, and transparency. We are dedicated to ensuring that all colleagues are treated with dignity and respect and can perform their roles free from harassment, discrimination, or any other compromising behaviour.

5.2 Recruitment and Vetting

In compliance with statutory requirements, all schools and academies within SET conduct rigorous recruitment and vetting checks for individuals working within their establishments. This includes verifying the right to work in the UK and maintaining an up-to-date Single Central Record of these checks. By ensuring thorough vetting, we minimise the risk of employing individuals who may be vulnerable to exploitation.

5.3 Whistleblowing Policy

Our Whistleblowing Policy obligates all employees to report any instances of impropriety, including criminal activity and improper conduct, such as modern slavery. The policy outlines a clear and confidential process for reporting such concerns, with protections in place for whistleblowers. The policy will be updated to specifically reference modern slavery, emphasising that concerns related to these matters can be reported under the protection of the policy.

6. Procurement

6.1 Ethical Sourcing and Supplier Engagement

SET recognises that certain procurement activities, particularly in sectors such as construction and uniform supply, are more vulnerable to modern slavery offenses. We are committed to ensuring that our procurement practices are ethical and that our suppliers adhere to the Modern Slavery Act 2015.

6.2 Supplier Due Diligence

All tenders for the supply of goods and services include a requirement for suppliers to demonstrate their commitment to ethical trading and compliance with the Modern Slavery Act 2015. This includes providing assurances that their own operations and supply chains are free from modern slavery and human trafficking.

6.3 Contractual Obligations

When engaging contractors for construction projects or other high-risk activities, we incorporate specific clauses in our contracts that require compliance with the Modern Slavery Act 2015. Contractors are also required to ensure that their subcontractors adhere to the same standards.

6.4 Ongoing Monitoring and Assessment

We continuously seek assurances from our suppliers regarding their avoidance of modern slavery and human trafficking. This includes regular assessments of their ethical trading practices and the enforcement of our code of conduct for suppliers. We are committed to working with suppliers who share our values and who take proactive steps to eliminate modern slavery from their operations.

7. Training and Capacity Building

7.1 Employee Training

We are committed to raising awareness among our employees about the risks of modern slavery and human trafficking. All staff members receive training on how to identify and report potential cases of modern slavery, both within our operations and in our supply chains.

7.2 Leadership Development

Senior leaders and managers receive additional training to ensure they are equipped to implement and monitor our modern slavery policies effectively. This training includes guidance on conducting risk assessments, engaging with suppliers, and responding to any reports of modern slavery.

8. Monitoring and Reporting

8.1 Internal Monitoring

SET will regularly monitor the effectiveness of the measures outlined in this policy. This includes reviewing our internal processes, auditing supplier compliance, and assessing the impact of our training programs. Any areas of concern will be addressed promptly, and corrective actions will be implemented as necessary.

8.2 Annual Reporting

This policy is reviewed annually, and a formal statement on modern slavery and human trafficking is published each year in compliance with Section 54(1) of the Modern Slavery Act 2015. This statement is made available to all stakeholders and is included in our annual report.

8.3 Continuous Improvement

SET is committed to continuous improvement in our approach to tackling modern slavery. We will regularly review and update this policy to reflect changes in legislation, emerging risks, and best practices in combating modern slavery and human trafficking.

9. Conclusion

Shaw Education Trust is fully committed to ensuring that modern slavery and human trafficking have no place in our organisation or supply chains. We will continue to take proactive steps to identify, address, and eliminate any risks of modern slavery, ensuring that all individuals associated with our Trust are treated with dignity and respect. This policy reflects our dedication to upholding human rights and maintaining the highest ethical standards in all our operations.

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Shaw Education Trust's slavery and human trafficking statement for the financial year ending 31 August 2024.



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centred**

**Act with
integrity**

**Be
innovative**

**Be best
in class**

**Be
accountable**