



**Twyford**  
**C of E**  
Academies Trust

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<b>Policy Author</b>	<b>Director of Finance &amp; Operations</b>

# **Modern Slavery Statement**

## **1 Introduction and Purpose**

It is the Trust's policy to comply in full with its obligations under the Modern Slavery Act 2015 and this statement for the **year ending 31st August 2023** is published in compliance with section 54 of the Act. It follows the requirements of the following guidance:

<https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement> statutory guidance

It is also the Trust's policy to take steps to reduce the incidence of modern slavery or human trafficking through its educational activities and business operations.

Twyford Church of England Academies Trust is a Multi-Academy Trust with the purpose of providing excellent state education and related services through its schools.

## **2 Organisation structure and supply chains**

### **2.1 Governance and management structures**

The Trust is ultimately governed by a board of directors which oversees the work of a Chief Executive and Executive Team, which includes school head teachers and the head of the Trust's Teaching School Hub, Teach West London. The work of each headteacher is overseen by a local governing body and the work of the Teaching School Hub is directed by a steering group. The Trust, which is a charity, delivers some non-charitable activities through a trading subsidiary which is governed by directors.

### **2.2 Supply chains, partner organisations**

The Trust contracts out catering and cleaning services. It also buys a range of services from Ealing Council and the London Diocesan Board for Schools. It has major contracts in place for energy, IT hardware, software and services including printing and photocopying. The Trust also contracts with construction and building services companies. The Trust spends significant sums with recruitment agencies to provide temporary staff and candidates for permanent roles. The Trust is affiliated with the London Diocesan Board for Schools, a network of over 150 schools in central, north and west London. It also works with a network of schools across west London for the delivery of training programmes for teachers. As a provider of state education, the Trust also has close links with the Local Authority, the Department for Education and the Education and Skills Funding Agency. It also works with companies providing goods and services to parents such as school uniform suppliers and providers of travel and accommodation for school trips.

## **3 Policies in relation to slavery and human trafficking**

### **3.1 Staff recruitment and other employment policies**

The Trust has adopted staffing and employment policies which mitigate the risk of modern slavery and human trafficking in its employment and staffing practices. Among other provisions, the Trust has adopted a policy of paying the Real Living Wage and requiring providers of contracted out services to do likewise.

### **3.2 Value for money, sustainability and procurement policy**

The Trust has adopted a Value for Money, Sustainability and Procurement Policy which stipulates that procurement decisions balance value for money and sustainability. Sustainability includes social as well as environmental sustainability. Social sustainability means minimising economic disadvantage and inequality.

Furthermore it is the Trust's policy to operate in line with the ten principles of the UN Global Compact, supporting sustainable development.

### **3.3 Standard terms of business**

The Trust's standard Purchasing Terms and Conditions include requirements that the supplier has not been in breach of modern slavery legislation and has implemented policies and procedures to ensure compliance with modern slavery legislation and guidelines. Compliance with these requirements is also included as a condition in tender specifications and major contracts.

### **3.4 Work placements**

The Trust arranges unpaid work experience placements for its students. It has adopted a Work Experience Policy which ensures that placements are an educational activity rather than employment and mitigates the risk of a work experience placement being exploitative.

### **3.5 Whistleblowing Policy**

The Trust has adopted a Whistleblowing Policy which provides protection for staff raising concerns about the ethics or legality of any Trust activities.

## **4 Due diligence processes**

### **4.1 Employment of staff**

The Trust does not directly employ staff in areas at high risk of modern slavery. However, to mitigate the risk that exists, Trust HR staff are alert to warning signs such as poor supervision of agency recruitment, related offences being identified through DBS checks, numerous employees being registered at the same address and staff not being able to produce identity documents on demand.

### **4.2 Appointment of suppliers and contractors**

The Trust has identified procurement within sectors at higher risk of modern slavery practices, such as within the school uniform, catering, cleaning and construction supply chains. In addition to the requirements detailed in 3.3 above, the Trust will regularly check that major suppliers of services in these sectors are complying with these requirements and also adhering to their statutory obligations under the Modern Slavery Act.

## **5 Risk assessment and management and performance monitoring**

### **5.1 Item added to the Risk Register**

A risk has been added to the Trust's Risk Register to ensure action to mitigate the risk of non-compliance is regularly monitored.

## **6 Training on modern slavery and trafficking**

Finance, Human Resources and senior Trust staff receive basic training in the risks and requirements outlined in this document.