

## Modern Slavery Statement

### Slavery and Human Trafficking Statement for the Financial Year ending 31<sup>st</sup> August 2024

#### Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Priory Federation of Academies Trust (the Trust) and its academies during the year ending 31st August 2024 to prevent modern slavery and human trafficking in its education arms, business units and supply chains.

The Trust has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

#### Organisation

The Trust provides EYFS, primary, secondary and special education to a community of children and young people, as well as vocational, apprenticeship and teacher training opportunities to the post-16 sector. The Trust is the overarching body responsible, at the end of the 2023-24 academic year, for: The Priory Academy LSST; The Priory City of Lincoln Academy; The Priory Witham Academy; The Priory Ruskin Academy; The Priory Belvoir Academy; The Priory Pembroke Academy; Willoughby Academy; Ling Moor Primary Academy; Heighington Millfield Primary Academy; Huntingtower Community Primary Academy; Waddington Redwood Primary Academy; Cherry Willingham Primary Academy; and St John's Primary Academy. The Trust, which also operates Teacher Training and Apprenticeships arms, employs more than 1,600 members of staff and has an annual turnover of more than £60m.

#### Our supply chains

The Trust seeks excellence in every area of the organisation and strives to ensure the highest standards of professionalism, integrity and ethical business practice. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to ensure that they share our high standards.

We buy a wide range of external goods and services, including construction services and supplies, furniture and stationery, electronics (computers, audio visual etc), food and catering supplies, travel services, laboratory supplies (equipment, chemicals etc), books, cleaning services, printing and waste and recycling services and do so in accordance with public procurement law. A large proportion is bought through frameworks established by collaborative consortia.

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Modern Slavery and Human Trafficking are included within our new supplier risk assessment and due diligence procedures. We will continue to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. The Trust reserves the right to exclude any bidder, contractor or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.

## **Training and policies**

The Trust reminds all members of staff and volunteers on an annual basis of the values included within its Code of Conduct and receives acknowledgement of the Code from its freelancers, consultants and suppliers. Our HR team and associated support staff are trained to ensure, through our rigorous recruitment checks, that we do not employ people who are under-age or who do not have the right to work in the UK. Our contracts adhere to the European Working Time Directive.

The Trust operates a Whistleblowing Policy, aimed principally at our members of staff but also available to our suppliers, which encourages the reporting of any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial action taken. The Trust's Anti-Corruption and Bribery Policy reinforces the principles of ethical working practices.

The Trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Trust is committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Trust or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the Head of Human Resources immediately. If the matter is not remedied, members of staff are encouraged to raise it formally using the Grievance Procedure.

## **Further steps**

During the course of the next financial year, the Trust will continue to develop:

- Effective communications with our suppliers to confirm their understanding and compliance in line with our expectations.
- The inclusion of modern slavery and human trafficking clauses in our suppliers' standard terms and conditions.
- Specific training on modern slavery risks for relevant groups of staff.

## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Trust will terminate its relationship with immediate effect with other individuals and organisations working on its behalf if they are found to be in breach of this policy.

## **Governance**

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



**Ian Jones**

Chief Executive Officer

31<sup>st</sup> August 2024