

Modern Slavery and Human Trafficking Statement 2024

1. Introduction

1.1. This Statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).

1.2. Ebor Academy Trust does not engage in, or condone, the practices of human trafficking, slavery or forced labour. We are committed to the highest standards of ethical conduct in all our activities and making continuous improvements in this area.

2. About Ebor Academy Trust

2.1 Ebor Academy Trust is a values-led multi-academy trust – a family of schools with a sense of responsibility for each other. Ours is a mixed trust comprising both Community and Church schools. We have strong links with York St John University, work closely with the Diocese of York and have established many successful and innovative partnerships with organisations sharing common values and the same moral purpose.

We consist of small village schools, large urban schools, schools in challenging circumstances and those which have the capacity to support others.

Our schools operate in geographic hubs in York, Selby, on the Yorkshire Coast and in the East Riding and The Humber.

Ebor stands for Excellence, Belonging, Opportunity, Respect:

- **Excellence** in all we do
- A sense of **Belonging** and solidarity for everyone in our group
- **Opportunities** that are presented when we work well together
- **Respect** for what we do and for each other.

We celebrate the uniqueness of each individual setting and share skills and resources, where appropriate, across our group.

3. Risk Management

3.1. The Trust methodically addresses the risks attaching to its objectives and associated activities with the goal of achieving sustained benefit within each activity and across the whole range of activities.

3.2. Risk management will be aimed at ensuring that the Trust achieves its objectives in the most effective way and those resources are directed at those objectives. It will not be seen as a separate exercise but as the means of best achieving the Trust's objectives.

3.3. The Trust's risk management strategy has been designed to provide a framework for managing the risks the Trust faces and ensuring its objectives are achieved in the most effective way. It has been designed for use by all staff of the Trust and it serves to:

- Communicate the strategies for managing risk in the Trust
- Establish procedures which should be adopted in the risk management process

3.4. The Trust's overall risk management plan is aimed at:

- Protecting its students, staff and assets
- Managing risk in accordance with best practice and reducing the cost of risk
- Anticipating and responding to changing social, environmental and legislative requirements
- Raising awareness of the need for risk management
- Integrating risk management into the culture of the Trust
- Adopting legal compliance as a minimum standard

3.5 We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact Ebor Academy Trust. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils and the second is through our supply chain.

4. Policies

4.1. The Trust is committed to safeguarding and promoting the welfare of all its students and our Child Safeguarding Policy is in line with the Local Safeguarding Children Board Child Protection Procedures and DfE guidance.

4.1.1. Each Academy has a Designated Safeguarding Lead and Deputy.

4.1.2. Safeguarding link governors & Trustee help to ensure our academy's fulfil their aim of protecting and promoting the welfare of their students and comply with all statutory guidance; they are the link between governors, the academy and the Trust. They will raise awareness of safeguarding issues at governor and trustee meetings and give information on practices within the academy. The safeguarding Trustee will also report to the Trust Board on the review of the Safeguarding Annual Audit.

4.1.3. The Trust pays full regard to the DfE guidance 'Keeping Children Safe in Education 2024'. We ensure that all appropriate measures are applied in relation to everyone who works in the Trust, including volunteers and staff employed by contractors. Including an annual training/refresher programme for all staff.

4.1.4. Safer recruitment practice has been fully encompassed in the Trust's Recruitment Policy and its procedures. Safer recruitment practice includes scrutinising applications, verifying identity and qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also

includes undertaking rigorous election procedures and Disclosure and Barring Service (DBS) and other checks.

4.2. Indicators of modern slavery

4.2.1 The International Labour Office has identified four sets of operational indicators for adult and child victims of trafficking for labour and sexual exploitation. Each set is a structured list of indicators relevant to the following dimensions of the trafficking definition:

- Deceptive recruitment (or deception during recruitment, transfer and transportation)
- Coercive recruitment (or coercion during recruitment, transfer and transportation)
- Recruitment by abuse of vulnerability
- Exploitative conditions of work
- Coercion at destination

A full list of the indicators under each heading can be found here:

[Operational indicators of trafficking in human beings.](#)

4.2.2 These indicators will be considered within the internal recruitment of staff to the workforce as potential indicators of previous Modern Slavery. They will also be considered within our Child Safeguarding procedures to identify children at risk of modern slavery.

4.3. We recognise that the public sector equality duty has three aims and they are to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct under the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who have a shared characteristic and those who do not

4.3.1. Ebor Academy Trust will annually review how well we achieve these aims with regard to the protected groups under the Equality Act (race, disability, gender, gender re-assignment, age, pregnancy and maternity, marital status, religion and belief and sexual orientation.)

4.3.2. We aim to provide the highest possible education for all of our students. The ethos of our academies, both in our church and non-church schools, clearly reflects our commitment to fully including and respecting all members of our local communities.

4.4. Ebor Academy Trust has in place a Whistleblowing Policy which describes whistleblowing as the reporting by workers/employees, or ex-workers/employees, of wrong doing such as fraud, malpractice, mismanagement, breach of health and safety law, child

safeguarding concerns or any other illegal or unethical act on the part of management, the governing body, the Trust or by fellow employees.

4.4.1. An example of malpractice or illegal or unethical practice that maybe reported under the Whistleblowing Procedure include:

- Public funds are being used in an unauthorised manner;

5.Procurement and Supply Chain Management

5.1. All procurement must be carried out in compliance with the Public Contracts Regulations 2023 and related regulations.

We are committed to ensuring that there is transparency in our business and our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our procurement and contracting processes to include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

A major risk to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act we will endeavour to eliminate the risks as much as possible.

We are committed to ensuring our supply chains, which rely on people, can demonstrate adherence with local and national laws and regulations, including paying the minimum wage.

5.2. A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium, framework or appointed through means of a tender process. Our supply chains include:

- Education equipment, textbooks and resources suppliers
- Educational & Professional services
- Estate management maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff