



## Modern Slavery statement

### Our Statement

This statement is made on behalf of Swale Academies Trust (company number 07344732) with regards to the Modern Slavery Act 2015 (the Act). This statement summarises how we operate, the policies and processes in place and how we monitor risks identified and train our employees. This statement is published in accordance with section 54 of the Act and relates to the financial year September 2020 to August 2021. This document will be reviewed on an annual basis.

We do not engage in or condone: the practices of human trafficking, slavery or forced labour.

### Organisational Structure

Swale Academies Trust is a multi-academy trust established under the Academies Act 2010. We are a company limited by guarantee and an exempt charity, the memorandum and articles of association are our primary governing documents. The Trustees of the Trust are also the directors for the purposes of company law.

Swale Academies Trust comprises of both primary and secondary schools, operating within the education sector across Kent, Bromley and East Sussex. All staff within the organisation report ultimately to the Trust Principal (CEO), who in turn reports to the Trust Board.

### Our suppliers

Our current contractors and suppliers are predominantly based in the United Kingdom. When procuring goods and services relating to higher risk categories we will use reasonable endeavours to encourage and ensure suppliers can, wherever possible, demonstrate their compliance to the Act.

Our supply chains include:

- Education equipment, textbooks and resources
- Student and staff uniform suppliers
- Estate management maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff.

We purchase goods and services in line with the Academy Trust Handbook, which ensures compliance with legislation and best practice.

### Policies

We continuously review our policies and procedures. The policies that we consider gives us strength on avoiding modern slavery or human trafficking under the Act are:

- Safer Recruitment
- Whistleblowing
- Child Protection and Safeguarding
- Equality Statement
- Anti-Fraud and Corruption
- Acceptance of Gifts and Hospitality
- Financial Regulations

### **Risk assessment and management**

Our risk register, which includes all key areas of risk, is regularly updated and reviewed. The risk register is presented to the Audit and Risk committee on an annual basis for approval.

We have identified areas which carry the greatest risk in relation to modern slavery and human trafficking, these alongside any modern slavery controls that are in place to mitigate risk will be included in all reviews of the risk register.

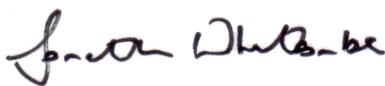
Reference to modern slavery and human trafficking has been included within our Child Protection and Safeguarding policy. All staff receive safeguarding training on a regular basis. Additional on-line training via Educare is available; this includes safer recruitment and awareness of modern slavery and trafficking. We will promote the on-line training platform to all employees, continuing our commitment to CPD for all staff.

### **Next steps**

We commit to taking the following steps during the next academic year:

- Circulate this statement to all employees to raise awareness.
- We will continue to build on the work already undertaken to develop our understanding on modern Slavery and human trafficking ensuring we respond appropriately.
- Key policies will be updated in line with our policy framework to include, where appropriate, reference to the Act.
- Promote on-line learning around relevant areas.
- Develop the Risk Register to ensure modern slavery and controls are identified.
- We will continue to use stringent safer recruitment guidelines for all appointments, ensuring the same procedure is followed for all posts.
- Pay policy reviewed annually to ensure pay reflects the national minimum wage guidance.
- Review contracts and suppliers, working with them to ensure supply chains are monitored and appropriate action is taken.

This statement has been approved by the Swale Academies Trust Board on 22 March 2022.



**Jonathan Whitcombe**  
**Chief Executive Officer**  
**22 March 2022**