

# People Directorate

## Modern Slavery Statement



Document title	People Directorate: Modern Slavery Statement
Version number	2
Policy status	Final for Approval
TSAT Board Approved	6 <sup>th</sup> March 2025
Union Approved	NA
Date of issue	Apri 2026
Date to be revised	April 2027

### Revision Log (last 5 changes)

Date	Version No	Brief detail of change
01/09/23	1	New
01/09/24	2	Revised and dates updated

# People Directorate

## Modern Slavery Statement



### Table of Contents

Why do we have this policy? .....3

Introduction? .....3

**Commitment?**.....3

**Employment legislation**.....3

**Supply Chains** .....4

**Risk Assessments** .....4

**Actions**.....5

**Declaration**.....6

# People Directorate

## Modern Slavery Statement



### Why do we have this policy?

The 2015 Modern Slavery Act introduced a requirement for large organisations to produce a modern slavery statement each financial year.

### Introduction?

The Thinking Schools Academy Trust is a non-profit making charitable company limited by guarantee, registered in Chatham, Medway.

The Thinking Schools Academy Trust, is made up of a family of schools that work together to “improve the life chances” of all our children and young people. We share a common mission to nurture successful children who are confident and can think and act independently.

At the heart of The Thinking Schools Academy Trust is the belief that the work that we do must transform the life chances of students.

We believe that the best way to transform life chances is to actively shape the minds, attitudes and habits of young people through a framework of cognitive education that enables them to become the master of their own destiny.

The ultimate goal is that every individual, child or adult, in the organisation consciously recognises their own habits, strengths and areas for development and actively seeks to improve themselves, thereby creating transformational changes in each individual.

From September 2024 there are 26 academies in our Trust covering four regions: Southeast, East, South and the Southwest. The Thinking Schools Academy Trust is made up of schools including Primary Schools, Grammar Schools, High Schools, Comprehensive Schools & PRU provisions. We have circa. 16,000 students and 2,200 staff across our Trust.

### Commitment?

This statement sets out the Thinking Schools Academy Trusts actions to understand all potential modern slavery and human trafficking risks related to its activity and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and our supply chains.

The Thinking Schools Academy Trust is committed to ensuring there is no slavery or human trafficking in our supply chains. We recognise our responsibility to take a robust approach to slavery and human trafficking, ensuring that we are fully compliant with the Modern Slavery Act 2015.

We are committed to the highest ethical standards in all our activities and will make continuous improvements in these areas. We believe there is a low risk of slavery or human trafficking having a connection with our activities.

### Employment legislation

The Trust works primarily with UK-based suppliers and contractors and employees are protected under UK employment legislation and working time directive. The Trust does not directly conduct business in countries where there is a documented problem with human trafficking or slavery. We are aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.

# People Directorate

## Modern Slavery Statement



### Supply Chains

All schools have access to the same level of support and services provided by the Trust; we pride ourselves on the high quality of these support services. The Trust has its own central services team that provide the following services.

- Thinking Personnel
- Thinking Finance
- Thinking Technology
- Thinking Facilities
- Thinking Fitness
- Thinking Creative

The Trusts supply chains are predominantly drawn from the following services.

- Cleaning contracts
- Catering contracts
- Construction/building works
- Education supply staff
- Self-employed education support services
- Education and office equipment suppliers
- ICT equipment suppliers

We have identified that some of our procurement could take place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the construction industry.

As part of our cleaning contract conditions, contractors are required to sign and agree with our declaration relating to modern slavery and human trafficking.

### Risk Assessments

#### High risk activities:

- We do not believe there are any high-risk operations within the Trust or within our supply chains in regards to slavery and human trafficking.

#### Medium risk activities:

- Supply chains linked to catering and cleaning provisions as result of the use of external contractors.
- Supply chains linked to the manufacturing of ICT equipment, education and office supplies and the use of external suppliers who may manufacture overseas.
- The use of external contractors for construction and building.

#### Low risk:

- The use of self-employed education services or external supply agencies.

# People Directorate

## Modern Slavery Statement



### Actions

Area	What's in place	Recommendations
<p><b>Policies and procedures</b></p>	<p>Our child protection and safeguarding policies include trafficking and modern slavery risks.</p> <p>We have a whistle blowing policy in place to help workers make disclosures without fear of retaliation.</p>	<p>Update the Procurement policy to include our commitment under the Modern Slavery Act 2015 and include Modern Slavery requirements within the standard terms and conditions of suppliers and consultants as part of this update.</p> <p>Update the following polices to draw attention to the risk of modern slavery.</p> <ul style="list-style-type: none"> <li>- Code of conduct</li> <li>- Equality policy</li> <li>- Whistleblowing</li> <li>- Recruitment</li> </ul>
<p><b>Procurement practice and process</b></p>	<p>The Public Contracts Regulations (2015) provide for:</p> <ul style="list-style-type: none"> <li>• mandatory exclusion of any supplier convicted of modern slavery, as well as any child labour or trafficking of human's offence.</li> <li>• discretionary exclusion of relevant organisations who fail to publish the requisite modern slavery statement.</li> </ul> <p>This allows the Trust, to enforce such provisions, when carrying out any above threshold tender exercises and to support this, the Trust includes Modern Slavery conditions, at the level appropriate to the risk, within tender contract conditions.</p>	<p>Conduct a more in-depth review of our supply chains to better understand the risks of modern slavery occurring within them</p> <p>Include compliance with the Modern Slavery Act as a condition of procurement documents</p> <p>Ensure supplier and contractor forms requests all contractors/ suppliers so to adhere to the modern slavery act</p> <p>Request a copy from contractors/ suppliers of their modern slavery statement as part of due diligence process.</p>
<p><b>Training, promotion and awareness</b></p>	<p>Safeguarding training for all new starters and annual safeguarding training for all staff that covers the modern slavery act 2015</p>	<p>Raise awareness amongst teams involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.</p>

# People Directorate

## Modern Slavery Statement



<b>Recruitment</b>	Comprehensive safer recruitment checks in line with KCSIE (Keeping Children Safe in Education).	Update our safer recruitment practices and checklists for contractors to include the requirement for suppliers and contractors to be compliant with the modern slavery act.
<b>Monitoring</b>		Any major suppliers that are covered in medium or high risk should be reviewed regularly and included in the compliance reporting to the Board and Trust risk register.

### Declaration

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Trusts Modern Slavery statement; this statement has been approved by Lee Miller the Deputy CEO and the Trust Board, who will review it regularly.