



# STEP Academy Trust

## Modern Slavery Act 2015: Slavery and Human Trafficking Statement

**DATE:** March 2019

**REVIEW:** March 2020

This statement is made pursuant to the provisions of Section 54 of the Modern Slavery Act 2015 (the 'Act') and sets out the steps that the STEP Academy Trust ('STEP') has taken and is continuing to take to ensure that modern slavery of human trafficking is not taking place within our organisation or supply chain.

STEP is committed to improving the life chances of all children. To ensure that STEP can achieve its mission, it has developed key values and principles. STEP First is the first key principle and is founded on the belief that we are all one team. This approach starts with strong internal communications and relationships across academies, teams, parents, governors and trustees, and extends through to close working partnerships with our suppliers, regulators and other stakeholders. As such, STEP is committed to ensuring that practices are in place to prevent business being undertaken with an organisation that has not adopted appropriate steps to ensure that human rights abuses is not taking place in any of its supply chains.

### **Organisational structure**

STEP operates in the education sector, operating a family of outstanding academies where world-class leaders place the children at the heart of everything. STEP operates across the South East of England, with academies reporting into the Executive Team, headed by the CEO, located in Croydon. The Executive Team report to the Trustees who bear ultimate legal responsibility for the Trust's activities.

STEP is an exempt educational charity and a company limited by guarantee.

The Board of Trustees is the strategic board with accountability for all Academies within the Trust.

STEP is responsible for 14 Academies:

- Angel Oak Academy
- Applegarth Academy
- Breakwater Academy
- Burfield Academy
- David Livingstone Academy
- Gonville Academy
- Hawkes Farm Academy
- Heathfield Academy
- High Cliff Academy
- La Fontaine Academy
- Phoenix Academy
- Tudor Academy
- Turnham Academy
- White House Academy

We have over 650 employees in our organisation.

## **Supply chain**

STEP uses a number of suppliers to support its operations and activities. These suppliers mostly supply services to us relating to agency workers, HR, recruitment, consultants, training providers, travel and professional services. We also procure a limited amount of goods in the form of curriculum resources, office supplies, furniture, IT and other materials used in our day-to-day operations.

The great majority of these goods and services we purchase are from within the UK and EU, where employment legislation is generally both reasonably comprehensive and enforced. In addition, where possible, STEP has established its own resources for catering & hospitality and cleaning services, industries in which there have been historically poor employment practices. All procurement is undertaken under the Trust's Best Value framework, where decision-making is not driven by cost. Large contacts are appointed under tendering arrangements, which are reviewed in line with Government frameworks. We therefore believe that the risk of modern slavery in our supply chain is relatively low.

The majority of STEP supplies are procured from STEP suppliers who have obligations under regulatory bodies and/or are also within the remit of the Act. As such, we are satisfied that our current tendering and procurements processes are sufficient.

Although the risk is considered low, STEP remains diligent to the risk and continues to review and improve its policies regularly.

As a Trust, STEP works in partnership with its suppliers, building strong working relationships and setting clear expectations, including the values of STEP. STEP is committed to addressing the effects of poverty and closing the gap between disadvantaged and non-disadvantaged pupils. This commitment also encompasses how the Trust pays its staff, all of whom are vital to the success of its Academies. STEP believes it has a moral obligation to investing in its staff and this includes ensuring everyone is able to provide for themselves and their families. STEP is committed to ensuring that all of its employees receive a fair rate of pay for their outstanding work. STEP partners are chosen for their commitment to STEP values.

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. STEP has a continuous and rigorous process for reviewing and updating processes and policies. STEP has a wide policy framework that supports the aims of the Act:

- Safer recruitment training
- Safeguarding training
- Whistleblowing Policy
- Employee Complaints (Grievance) Policy
- Recruitment Policy
- Staff Pay Policy
- Finance Procedures
- Equality Policy

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk STEP carries out risk assessments for all its Academies and projects that are managed by the Trust; this includes risk management measures such as risk registers and cross-functional teams to ensure contract and risk oversight of all areas.

These are all constantly reviewed to ensure their continued effectiveness in managing any risk. As part of its continuous policy development, STEP will continue to assess and review the areas of its processes where the Act could be contravened. STEP considers the risk likelihood of contravention of the Act to be very low.

## **Culture**

STEP is committed to ensuring that the maximum value and benefit is achieved from the funding received. This means that Value for Money is considered a key performance indicator and it is essential for the success of the pupils, academies and the Trust that we are able to ensure and evidence that funding is being used in the most effective way.

STEP's commitment to achieving Value for Money does not compromise the obligations contained in the Act; STEP does not look primarily at costs of its suppliers, but instead considers the supplier as a whole, the quality and longevity of services and goods, the additional benefits of the supplier relationship and value of the supplier as a partner in achieving the STEP mission, vision and values. These considerations are embedded in the STEP culture and are a vital safeguard in ensuring that goods or services are provided by suppliers who respect and adhere to the Act.

STEP values are part of the everyday culture of STEP life, and are included in all aspects of training, from induction to conferences and training and development days. This culture ensures that employees feel confident in living these values, and flagging any risks or areas of improvement that they may come across, this includes the Act.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to our staff.

## **Our effectiveness in combating slavery and human trafficking**

We use the following indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 August 2018 approved and signed by Mark Ducker, Chief Executive Officer, STEP Academy Trust.

