



King's Group Academies Modern slavery statement

Approved by:	Trustees	Date:	October 25
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Organisation

This statement applies to King's Group Academies (referred to in this statement as "KGA").

Organisational structure

King's Group Academies is a multi-academy trust registered in Portsmouth comprising of 15 schools located across Hampshire, East Sussex and Berkshire. We are passionate about the growing problem of modern slavery and prioritise transparency in our operations.

Our Trust Values of Honesty, Faith and Courage are represented throughout this process:

- We are honest, responsible, compliant and accountable for the spending of public and charitable funds
- We have faith and ensure that safeguarding is at the heart of all that we do
- We are courageous in ensuring that ethical treatment of all individuals is considered in all aspects of our work

Introduction

Slavery and human trafficking are criminal offences and abhorrent practices to which King's Group Academies takes a zero-tolerance approach. King's Group Academies is committed to helping tackle this problem and ensuring that slavery and human trafficking do not take place within our operations or supply chains. To this end we will ensure all trustees, relevant staff and representatives are suitably briefed or trained and made aware of this.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Purpose

The aims of this statement are:

1. To ensure that the business operations are completely free from modern slavery and human trafficking
2. To ensure that KGA's position on preventing slavery and human trafficking is reflected through out operations and decisions
3. To ensure that those who work for KGA, whether staff, suppliers, contractors or volunteers, act in a way that helps prevent slavery and human trafficking
4. To demonstrate due diligence and help reduce the risk of slavery and human trafficking in our activities



5. To provide assurances to those that KGA does business with that we have an effective system in place
6. To manage our risks and ensure our activities reflect our values, meet our stakeholders' expectations and protect our reputation.

Scope

The aims of this policy are applicable to the Trusts' operations and supply chain; to our Memorandums of Understanding and agreements; and to all those with whom we have a working or commercial relationship.

Our supply chain includes:

- Audit
- Catering
- Corporate costs
- Marketing and advertising
- Music services
- Printing postage and stationery
- Recruitment
- Educational consultancy
- Educational provisions
- Educational Supplies
- Educational visits
- Estates and facilities management
- Hire of equipment
- Insurance
- Licenses and subscriptions
- School Uniform
- Staff development
- Staff expenses
- Support staff costs
- Technology costs
- Telephony
- Utilities

Roles and Responsibilities

The Chief Executive will hold the Executive and Senior Leadership Teams within individual schools responsible for taking steps to ensure this policy is promoted, understood and implemented by all employees and any individuals who may represent the organisation or deliver our products and services.

All employees, representatives and those delivering our products and services are responsible for taking steps to promote the principles of this policy to help prevent slavery and human trafficking. Similarly, all individuals are expected to challenge and report any breaches of the policy.

KGA Commitment

King's Group Academies acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.



No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

KGA seeks the highest standards of compliance, ethics and integrity in all areas of the organisation and is committed to ensuring that due diligence is always conducted with regard to ensuring that modern slavery holds no place in its operations.

Recruitment

KGA conducts all its recruitment processes in line with its Safer Recruitment policy and Safeguarding and Child Protection policy. There are stringent processes for recruiting staff and thoroughly checking that they are legally entitled to work in the UK.

Risk Assessment and Due Diligence

KGA has identified specific supply chains and recruitment channels in which there is a heightened risk of modern slavery, assessed potential risk areas within these and implemented mitigating actions against these risks. These risks are under continual review.

Risk factors for consideration include:

- Country risks - exposure may be greater in global supply chains in countries where protection against human rights is limited, particularly with regard to rights of foreign contract workers to retain their own ID and papers, and/or where work arrangement by agents is common.
- Sector risks - there are different risks and levels of risk in different sectors.
- Transaction risks – banks or financial institutions may be involved in facilitating financing from or supporting cases of modern slavery and bonded labour in operations or supply chains or through money laundering.
- Business partnership risks – different supplier relationships and business partnerships will all carry different levels of risks.

Procurement and Supply chains

In order ensure high standards are continually met, we also maintain the following due diligence practices on new suppliers:

- Obtaining evidence that suppliers pay their staff at least the correct minimum wage.
- Obtaining a copy of suppliers' anti-slavery policies or statements.
- Ensuring suppliers can provide relevant health and safety checks.

We expect all suppliers working with KGA to ensure they are compliant with the Modern Slavery Act 2015 in their operations, and we routinely seek assurances from them to this effect, ensuring any weak areas are investigated and appropriate actions taken.

Training

All staff members, local governors and trustees receive training on modern slavery and the related policies



Academies:

This statement applies to all academies within the King's Group Academies Trust.