

Modern Slavery Statement 20-21

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Athena-GEP is committed to the highest standards of ethical conduct in all our activities. This statement sets out the actions taken by Athena-GEP to understand the potential modern slavery risks related to our organisation and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own operations and our supply chains.

Athena-GEP Structure and Supply Chains

Athena-GEP ('the trust') is a charitable company and Multi-Academy Trust that operates 12 schools. This statement covers the activities of the entire trust, as well as 'Fullbrook Sports Centre Ltd', a wholly owned subsidiary that is responsible for the external hire of sports facilities at Fullbrook School.

Each school within Athena-GEP is led and run by its own Headteacher and supported by a Local Governing Body. The trust delegates wide-ranging authority to its school leaders, within a broad policy and process framework set by the trust. Schools have authority to select their own suppliers and to appoint their own staff, provided that this is done within the trust's policies and processes.

The trust educates 7,500 pupils and employs over 1,100 teachers and support staff. The trust's supply chains are drawn mainly from the catering, contract cleaning, construction, educational resources and educational supply markets.

Risk Assessment and Management

The Board of Trustees regularly review the major risks to which Athena-GEP is exposed. Risk management strategies have been implemented to ensure risk management is embedded in our day to day processes. Our internal scrutiny programme, as well as our annual external audit, checks our compliance with policies and procedures. Any non-compliance or serious breach of policy is communicated to senior management and the Audit Committee.

Our risk register identifies a medium risk of modern slavery within our supply chains, due to the trust's use of external contractors and suppliers in sectors such as catering, cleaning, construction and school uniform.

The trust operates a consistent pay policy and pay framework across all 12 schools and its trading subsidiary; the trust is therefore confident that its employees are paid properly and fairly for their work.

Relevant Policies

The Board of Trustees has implemented a number of policies which underpin our commitment to acting with integrity in this area:

Child Protection and Safeguarding Policy

Athena-GEP has a Child Protection and Safeguarding policy in place which focuses on the need to ensure that all children are safe, respected and valued.

This policy and associated training ensures that our staff are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

Our child protection and safeguarding policy specifically identifies modern slavery as a form of harm and provides guidance for staff who believe a child is at risk of harm. Headteachers, together with Designated Safeguarding Leads, are required to ensure that staff and governors have at least annual safeguarding training and access to up to date information in relation to forms of neglect and abuse.

Our schools have processes in place to ensure that the voices of our children are heard and that they are able to voice any concerns they may have. If a child is persistently absent from school every school has a process to investigate the reasons for this and for ongoing monitoring.

One of the Trustees has a nominated responsibility for safeguarding, reporting on a regular basis to the Trust Board and periodically arranging audits to provide assurance that safeguarding policies and procedures are adhered to and that training has been delivered.

HR Policies

In accordance with our aim of providing an excellent education for children and young people across the country, Athena-GEP wishes at all times to act and be seen to be act with the utmost integrity and expects all colleagues to act in the same manner.

Athena-GEP is committed to the provision of an open, honest and transparent working environment for all colleagues, prospective colleagues, and others working in or visiting its premises. We are committed to ensuring all colleagues are treated with dignity and respect and are able to carry out their job role free from conflict, risk, harassment or any other behaviour perceived to be compromising, demeaning or demoralizing. The trust has a number of HR policies in place which ensure that this ethos is put into effect. New staff receive appropriate training regarding Athena-GEP's policies and procedures.

Athena-GEP operates a consistent Pay Policy and pay framework across the organisation and is committed to ensure that all staff receive, as a minimum, the National Minimum Wage.

It is a statutory requirement for all schools and academies to undertake certain recruitment and vetting checks on individuals working within their establishment and to maintain a live Single Central Record of these checks. Therefore, all our schools and the central office are able to demonstrate that vetting checks, including proof of right to work in the UK, have been carried out for all staff.

Whistle-blowing Policy

Our Whistleblowing Policy encourages all individuals to raise concerns that they may have about the conduct or practices of others and sets out the procedure that should be followed.

Athena-GEP is committed to ensuring that any concerns of this nature are taken seriously and investigated. Our policy makes clear that individuals raising concerns will be protected.

Finance and Procurement Policy

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

Our catering and cleaning contractors are required to check an individual's right to work in the UK and carry out a DBS check prior to hiring staff to work in our schools. Major tenders for supply of services and or goods will include a requirement for the supplier to report on their ethical trading including ensuring they also comply with Modern Slavery Act 2015. Where minor tenders are carried out, schools are required to consider the possible risks of Modern Slavery associated with the contract.

When one of our schools is selecting a new school uniform supplier, we will consider potential suppliers' ethical trading policies and review their code of conduct for suppliers as part of the selection process.

The trust may terminate its relationship with individuals and organisations working on its behalf if they are found to have breached this policy statement.

Progress in 20-21

This is the first Modern Slavery Statement published by Athena-GEP. The Trust is currently below the threshold size whereby a statement is required, but has chosen to publish a statement this year in view of the fact that the Trust will exceed the threshold size in September 2021.

This year, the trust has focussed on assessing the risks of modern slavery within its supply chain and implementing the controls described in this document.

Plans for 21-22

During the academic year 2021-22 we will further raise awareness amongst central office colleagues and school business managers (who represent the staff most likely to be involved in procurement) of the risks of modern slavery occurring within our supply chains and include compliance with the Modern Slavery Act as a conditions or criterion in specification and tender documents wherever possible.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, for the financial year ending 31 August 2021.

Fergal Roche

Chair of Trustees

28th September 2021