

## Modern Slavery and Human Trafficking Statement 2024

### Introduction

Because our trust works primarily with UK-based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst our trust does not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.

Our trust is committed to the highest standards of ethical conduct in all our activities and to making continuous improvements in this area. We believe that there is a low risk of slavery or human trafficking having a connection with our activities.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within our trust and within our supply chains to ensure that we are fully compliant with the Modern Slavery Act 2015.

### Structure and supply chains

This statement covers the activities of Dixons Academies Trust. Our trust is committed to giving young people an excellent education within a happy, caring and supportive environment.

Each academy is led and run by its principal and other senior leaders and has its own curriculum and way of doing things within the bounds of aligned autonomy. Our current academies are all within Leeds, Bradford, Manchester and Liverpool.

Our trust educates around 14,000 students and employs over 1,800 employees.

Our trust's supply chains are drawn mainly from the catering, contract cleaning and education supply market.

### Policies on modern slavery

The policies we have in place and our anti-slavery statement reflect our commitment to paying people fairly and properly for their work; acting ethically and with integrity in all our business relationships; and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our trust or our supply chains.

All policies are reviewed by senior managers and signed off by the Board, following (where appropriate) thorough consultation with all relevant stakeholders. Policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change and academy feedback.

### Due diligence processes

Academy principals or our trust executives, with assistance from the governance and compliance and/or human resources teams, are responsible for investigating any suspected instances of modern slavery and human trafficking.

### Risk assessment

Our trust has assessed the risks of modern slavery and human trafficking as follows.

#### High risk activities

- We do not believe there to be any high-risk operations within our trust or within our supply chain with regards to modern slavery and human trafficking.

#### Medium risk activities

- Supply chains linked to the catering and cleaning provisions because of our trust's use of external contractors.
- Supply chains linked to the manufacture of IT equipment and school uniforms, as a consequence of our trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

#### Low risk activities

- Provision of agency staff predominantly in teaching and support staff.

### Recruitment and training for staff

Our trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines.

The majority of our trust's staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third-party agencies.

In line with our commitments to safeguarding, our trust operates a preferred supplier group for employment agencies, with each agency agreeing to terms of business prior to any engagement. Agencies are selected based on their vetting policies, compliance processes, worker pay, and mandatory industry accreditation. Copies of the agency's modern slavery statement are also requested. Those agencies selected to work with our trust are reviewed regularly for best practice, and all new employment agencies wishing to be considered are reviewed against our requirements, before accepting workers from that agency.

All employees who join our trust are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right-to-work checks.

For roles covered by agency workers, our trust will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our rigorous supplier verification process which includes due diligence on their organisation.

### **Fair pay**

Our trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our sub-contractors, receive at least the appropriate National Minimum Wage.

### **Whistleblowing**

Our trust encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

### **Measuring effectiveness**

Our trust strives to maintain the highest standards of employee conduct and ethical behaviour and our policies enhance our commitment to act ethically and with integrity throughout our schools. Policies and procedures are kept under review to make sure they reflect the changing needs of Dixons Academies Trust and of our staff, students and the communities it serves.

### **Procurement practice and suppliers**

Our trust is committed to ensuring that its key suppliers adhere to the highest standards of ethics. We recognise that modern slavery is a complex supply chain issue and suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

As part of the procurement and tendering practice, we follow the statutory obligations and regulations in our contracts including unlawful discrimination, corrupt gifts and payment of commission, confidentiality, intellectual property and data protection, UK Modern Slavery Act 2015, Freedom of Information Act, rates of wages, hours and conditions.

Our trust will work with its key suppliers to ensure that they meet these standards: any serious violation of our trust's standards will lead to a review and possible termination of the business relationship.

All major supply contracts, notably those identified as presenting a medium or high risk, are reviewed regularly with the results reported to our Trust Board to ensure that they are complying with the expectations of our trust.

Our trust operates a due diligence process in the tendering and appointment of suppliers. This Modern Slavery and Human Trafficking Statement is published on our trust's website. We request and review a copy of the same from our high and medium risk suppliers, as well as undertaking several due diligence checks on them which are in line with Public Contract Regulations 2015. For suppliers where there is deemed to be an additional risk of slavery or human trafficking, supplementary checks are completed.

### **Our commitment**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our trust's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2023.

**Luke Sparkes**  
**Chief Executive**  
**8 February 2024**

