



This is the first statement made on behalf of The Challenge Academy Trust (TCAT) pursuant to Section 54(1) of the Modern Slavery Act 2015. This statement sets out the steps that TCAT has taken during the year ending 31 December 2018 to ensure that slavery and human trafficking is not taking place in any part of our business or that of its supply chain.

We are committed to operating responsibly and with high ethical standards, particularly with regard to human rights issues and will not tolerate human trafficking and other kinds of slavery within our operations. We expect equally high standards from our suppliers.

Organisational Structure and Supply Chains

TCAT was established in 2017 when a group of Warrington primary and secondary schools together with the local Sixth Form college joined together to form a Multi-Academy Trust with the aim of improving the educational opportunities and life chances for all pupils within our schools and across Warrington. We are a community of 8 academies in Warrington with over 6,500 children and young people and 850 staff.

Core to our approach is a robust governance structure. We aim to build management capacity and understanding of the issues raised by Modern Slavery, to ensure a consistent approach and to build understanding across the trust. In line with our values, TCAT is committed to ensuring there is no modern slavery or human trafficking within any part of its business or supply chain.

The success of our trust is reliant on our people and the people we work with, including our suppliers and partners. We expect all of our employees, suppliers and partners to uphold our values:

- openness and transparency
- accountability and continuous improvement
- effective and strong governance
- management of resources to achieve economies, efficiencies and effectiveness across our operations

Risk Management

As part of our initiative to identify and mitigate risk we have identified the principal areas which carry material risks which are centred on procurement. TCAT ensures that suppliers are required to demonstrate their methods of corporate social responsibility during the tendering and selection process, details of which may vary according to the project. TCAT reserves the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

We seek to

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

Procurement and Supply chain management

A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium or appointed through means of a tender process. Our supply chains include:

- Education equipment, textbooks and resources suppliers
- Student and staff uniform suppliers
- Estate management maintenance and services
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Peripatetic music services
- Supply/agency staff

We have carried out a risk assessment of our supply chain against the likelihood of the following three traits of slavery and human trafficking occurring:

- Forced labour
- Work and life under duress
- Impossibility of leaving an employer

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the construction industry. We will be taking the following steps to promote awareness of this during 2019:

1. Raise awareness amongst our academy based teams involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.
2. Include compliance with the Modern Slavery Act as a condition or criterion in specification and tender documents wherever possible.
3. Review the procedures in place to approve new suppliers and look to incorporate a statement requiring all suppliers adhere to the Modern Slavery Act.

Our policies to resist modern slavery and human trafficking

We are reviewing our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among our colleagues at work and within TCAT. Our policies and procedures are kept under review to make sure that they reflect the changing needs of TCAT and of the staff, students/pupils and the communities it serves.

Among the policies and procedures that we consider give us strength in avoiding modern slavery or human trafficking under the Act in TCAT and its member academies are:

- Equality & Diversity policies
- Financial and Procurement regulations
- Safeguarding and Child Protection policies
- Safer Recruitment procedures
- Whistleblowing Policy

In addition all our academies work towards educating others on slavery & human trafficking through curriculum delivery for example through the history, geography and PSHE curriculum.

Our Employees

There are currently over 850 people employed by TCAT. All new employees are subject to pre-employment checks to ensure their right to work in the UK and to confirm their identity. All employees are provided with information about their statutory rights, including sick pay, holiday entitlements, parental leave, flexible working and any other benefits to which they may be entitled. All TCAT staff are employed on national terms and conditions (Teachers Pay and Conditions for teaching staff and NJC terms and conditions for support staff) and we ensure that our recruitment agencies comply with all legal requirements.

Training and continuing vigilance

Raising awareness both internally and externally of the human rights aspects of slavery and trafficking is a fundamental step in preventing it occurring within our supply chain.

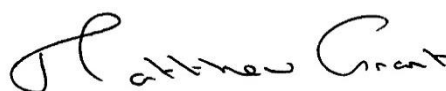
TCAT's next steps are

- To ensure that all senior employees and trustees and those working in the field of Finance and Procurement, Facilities Management and Human Resources undergo relevant training
- Provide guidance to our finance team and those involved in procurement of the need to avoid those risks and on possible indicators of them during the procurement of goods and services.
- Enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

This statement was approved by the Board of The Challenge Academy Trust on 13th March 2019.



Howard Platt
Chair of the Trust Board
13th March 2019



Matthew Grant
CEO
13th March 2019