

# Modern Slavery Act 2015: Slavery and Human Trafficking Statement

**DATE: July 2025**

**REVIEW: July 2026**

This statement is made on behalf of Shireland Collegiate Academy Trust (The Trust) pursuant to the provisions of Section 54 of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement.

The Trust recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Trust is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.

## Introduction

Slavery and human trafficking are criminal offences and abhorrent practices to which the Trust takes a zero-tolerance approach. The Trust is committed to helping tackle this problem and ensuring that slavery and human trafficking does 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 our policy.

## Purpose

The aims of the policy are:

- To ensure that business operations are completely free from modern slavery and human trafficking.
- To ensure that the Trust's position on preventing slavery and human trafficking is reflected throughout our operations and decisions
- To ensure those who do work for the Trust, whether staff, suppliers or volunteers, act in a way that helps prevent slavery and human trafficking
- To demonstrate due diligence and help reduce the risk of slavery and human trafficking in our activities
- To provide assurances to those the Trust does business with that we have an effective system in place
- 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
Marketing and advertising	Music services
Printing postage and stationery	Recruitment
Educational consultancy	Educational supplies
Educational visits	Estates and facilities management
Hire of equipment	Insurance
Licenses and subscriptions	School Uniform
Staff development	Staff expenses
Technology costs	Utilities

## Organisational structure

The Trust operates in the education sector, developing a family of academies where empowered leaders place our learners at the heart of everything and all are supported to be successful. The Trust operates across the West Midlands, with academies reporting into the Executive Team, headed by the CEO. The Executive Team report to the Trustees who bear ultimate legal responsibility for the Trust's activities.

The Trust 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.

The Trust is responsible for 12 Academies and 2 Nurseries:

Shireland Collegiate Academy	Shireland Technology Primary
Thorns Collegiate Academy	Holyhead Primary Academy
West Bromwich Collegiate Academy	Tameside Primary Academy
Shireland Bio Medical UTC	Wallbrook Primary Academy
Shireland CBSO Academy	Lightwoods Primary Academy
First Steps Nursery	Newfield Park Primary Academy
Tinywoods Nursery	Wednesfield Technology Primary

We have over 1000 employees in our organisation.

## Our approach

We work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those we work

with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

### **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. The Trust has a continuous and rigorous process for reviewing and updating processes and policies. The Trust has a wide policy framework that supports the aims of the Act:

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

### **Identifying and addressing risks**

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact The Trust. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

### **Supply chain**

The Trust's procurement regulations set out the requirements we have in relation to our engagement with suppliers. Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS check. We publish our standard terms and conditions to ensure providers looking to contract with us are aware of our standards. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

The great majority of the goods and services we purchase are from within the UK and EU, where employment legislation is generally both reasonably comprehensive and enforced. All procurement is undertaken under the Trust's Best Value framework, where decision-making is not driven by cost. Large contracts 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 Trust supplies are procured from 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 procurement processes are sufficient.

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

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. We are moving towards the predominance of contracts being appointed via frameworks which meet the requirements of the Modern Slavery Act 2015.

## **Safeguarding**

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Designated Safeguarding Lead in every academy and Nursery. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are experienced in this area and model excellent practice for all staff. Through their encouragement, each academy proactively works with the local authorities, the LADO and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared across the Trust and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice is reviewed annually across the Trust.

Safeguarding is an agenda item at every Standards and Performance Committee Meeting, each committee has a named link governor for safeguarding, and we have a named Trustee with portfolio responsibility for Safeguarding.

Our Trust Child Protection and Safeguarding Policy is reviewed annually by the Executive Leadership Team and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE 2024).

## **Training**

Every member of staff, is trained on the policy (either in person or via e-learning) and is required to declare annually that they have read and understood the policy and their training. In addition, The Trust has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of disciplinary action.

Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus upon on early identification of those at risk of exploitation and training to

help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk pupils, staff and contractors.

This is not an area for complacency however and we keep under closely scrutiny and evaluation our safeguarding policy and practice. This enables us to refine and develop excellence in all we do and in this Modern Slavery Statement for 2025-2026 we recognise the need to continually enhance the knowledge of our staff to prevent slavery and human trafficking and child sexual exploitation.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our estates.

## Reporting

To date, no referrals have been made in relation to modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

Signed: Sir Mark Grundy, CEO and Accounting Officer for Shireland Collegiate Academy Trust.

Dated:

Approved by the Board of Trustees on July 2025