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Modern Slavery Statement

1. This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by the Shaw Trust Group, which comprises those entities set out at *Business and Operational Structure* (below).
2. It covers the period 1 March 2026 – 28 February 2027 to prevent Modern Slavery and Human Trafficking in its own business operations and within supply chains.

Introduction

3. Shaw Trust is fully committed to the Modern Slavery Act 2015 and the duty it places on large organisations to disclose publicly the steps they are taking to prevent modern slavery organisationally and, in their supply chains.
4. Shaw Trust policies and procedures include and will continue to be updated to ensure that all required provisions to guide and embed standards of good practice, monitor compliance, and prevent modern slavery are observed.
5. Shaw Trust takes pride in its 'charitable heart with a commercial brain' approach. Its focus is to deliver quality services that also maximise social value and social investment to communities. This approach allows us to meet:

Vision

*A future where **good work** is accessible to all in society irrespective of their life circumstances.*

Mission

To provide programmes and services for people facing barriers to work to achieve their full potential, while multiplying our social impact by delivering innovative system-change.

Business and Operational Structure

5. Shaw Trust is the UK's largest Not-for-Profit (NFP) social enterprise in the employment sector and one of the largest charities in the UK. The Shaw Trust Group employs over 2,500 staff, and it owns:

- Careers Development Group
- Disabled Living Foundation Ltd
- Forth Sector
- Forth Sector Development Limited
- Good Work Partners
- Homes2Inspire Ltd
- Homes2Inspire Services Ltd
- Ixion CG Ltd

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Page 1 of 5

This document is **Unclassified**

- Ixion Holdings (Contracts) Limited
- Ixion Social Enterprise Limited
- Prospects Distribution Services Ltd
- Prospects Education Services Ltd
- Prospects Group 2011 Ltd
- Prospects Services
- Prospects Services Midco Ltd
- Shaw Trust International Partnerships Ltd

6. Shaw Trust also uses several suppliers across all its functions, to enable it to carry out its charitable and business purposes.

Key Focus Areas

7. The 2026-2027 period will see a focus on:

- a. **New Statutory Guidance.** Implementing detailed disclosure on actions, impact, and practical steps, moving beyond general statements to demonstrate real progress and continuous improvement.
- b. **Procurement Act 2023 alignment.** Integrating new procurement rules and using updated supplier risk assessment tools (including completion of the 'Responsible Sourcing Tool' to identify where the highest risks may be in our suppliers.
- c. **Mandatory training.** Ensuring compulsory training is undertaken by procurement, supply chain, and wider staff on modern slavery awareness.
- d. **Enhanced due diligence.** Applying more rigorous supplier risk assessments, audits, and contract clauses for compliance.
- e. **Stakeholder engagement.** Increasing focus on consulting colleagues and supply chain partners for better risk identification.
- f. **Policy integration.** Embedding modern slavery prevention into core policies and supplier codes of conduct.
- g. **Data and insight.** Reporting on specific types of exploitation (labour, sexual, criminal) and encouraging public/professional reporting.
- h. **Legislative changes.** Adapting to phased-in reforms from new legislation.

Governance Structure

8. The following hold key responsibilities in delivering Modern Slavery protections and implementing this statement:

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- a. Trustee Safeguarding Lead, providing oversight and reporting to the Board of Trustees.
- b. Chief Corporate and Risk Officer (CCRO), providing the organisational lead on Modern Slavery and Human Trafficking.
- c. Group Safeguarding Lead, providing detailed Line 2 oversight, direction and support to the organisation on behalf of the CCRO.
- d. Designated Leads for safeguarding at directorate level.

9. Our work in relation to Modern Slavery is supported and guided within the following policies:

- a. Shaw Trust Safeguarding Policy and Framework.
- b. Shaw Trust Safer Recruitment Policy.

10. Policy, performance, and risk are developed, reported and monitored through the following framework:



Responsible Recruitment

11. A Safer Recruitment Policy is in place that enshrines the following:

- a. Shaw Trust will only use recruitment agencies who are on its preferred supplier list and have gone through a due diligence process.
- b. There are independent teams that employees can contact, eg, HR Support Services (HRSS) for queries.
- c. Mandating training on Safer Recruitment for hiring managers.
- d. Completing background checks on new joiners, eg, DBS and reference checks.
- e. Confirming candidates have the right to work in the UK, with a requirement for Right-to-Work ID to be provided at the offer stage. Candidates are auto-rejected at the application stage if they do not confirm they have the right to work in the UK.

Training and Awareness

12. All Shaw Trust Staff complete a Modern Slavery training module within the first six months of working with Shaw Trust. The module is reviewed annually by the Group Safeguarding Lead.
13. Training completion is monitored by Shaw Trust Learning and Development Team and reported into the Operational Review process, and into the quarterly Audit and Risk Committee.
14. Colleagues have access to information and resources from the Home Office and the NGO Anti-slavery international organisation (www.antislavery.org) via our Safeguarding site on the Shaw Trust Intranet, *The Loop*.
15. Shaw Trust routinely provides information to staff throughout the year which includes Modern Slavery topics, highlighting communications on topic areas and resources within the document hub.

Due Diligence

16. Shaw Trust (including its subsidiary legal entities) operates under a Supply Chain Management Framework (SCMF). The SCMF sets a consistent standard for the management of Supply Chain Partners (SCP) and thereby: drive the behaviours required to operate to the benefit of our commissioners and participants; adhere to key performance expectations and legislation; and ensures we are providing value for money at every stage. The SCMF sets out the required approach to due diligence of SCPs.

SCP Selection, Due Diligence and Onboarding

17. When identifying SCPs for inclusion as part of commissioner-based contracts, Shaw Trust will hold an Expression of Interest process led by the Partnerships Team or, should new partners be required during a contract period, it will lead an Invitation-to-Tender procurement process.
18. Shaw Trust expects high standards and rigorous assurance regarding Modern Slavery, Safeguarding and Responsible Recruitment across the whole of the supply chain. Ahead of onboarding a partner, Shaw Trust will gather and assess a range of information including policies and processes, which are assessed by subject matter experts from across the organisation. Prior to onboarding all partners are signed-off by a senior leader as part of the delegated authority process.
19. Shaw Trust will always work with commissioners and supply chain partners to ensure fair pricing under the principles of the UK Prompt Payment Code to further minimise the risks of Modern Slavery.

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Key Performance Indicators (KPIs)

20. Shaw Trust is committed to monitor a set of KPIs in relation to Modern Slavery. These include:

- a. The delivery and monitoring of all staff and volunteers completing the mandatory Modern Slavery training module.
- b. Reporting and monitoring all Modern Slavery concerns raised through our central incident reporting function to the Strategic Safeguarding Group and to the Audit and Risk Committee.

Authorised by

21. This statement was approved by the Shaw Trust Board of Trustees on 26 February 2026 and signed on their behalf by:

Signed:



Chris Luck CB MBE DL
Chief Executive