

Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and relates to actions and activities during the year January 2024 – December 2025 and outlines the steps Affinity Learning Partnership ('The Trust') has taken during the financial year ending 31 August 2025 to prevent modern slavery and human trafficking in our operations and supply chains.

This statement sets out the Trust's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

1. Our organisation and supply chains

Affinity Learning Partnership is a Multi-Academy Trust (MAT) operating across Staffordshire and South Derbyshire comprising seven schools and employing approximately 600 staff. Our annual turnover exceeds £36 million. Our suppliers are UK based and encompass various sectors, including:

- Facilities management (cleaning, maintenance, catering)
- ICT equipment and services
- Educational materials and resources
- Agency staffing
- Construction and refurbishment projects.

We acknowledge that some of these sectors, particularly those involving low-skilled or temporary labour, may present higher risks of modern slavery.

2. Our policies, documentation and key relationships

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. 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. We act ethically and with integrity in all of our charitable and business activities.

Our policies reflect this commitment and include:

- **Procurement and Competitive Tendering Policy** - Ensures ethical sourcing and supplier due diligence.
- **Whistleblowing Policy** - Encourages reporting of concerns without fear of retaliation.

- **Safeguarding and Child Protection Policy** - Protects students and staff from harm.
- **Staff Code of Conduct** - Sets expectations for ethical behaviour.
- **Safer Recruitment Policy and Procedure** - Implements rigorous checks during hiring processes.
- **Supplier Terms and Conditions** - Prevents and mitigates modern slavery risks by embedding expectations, accountability, and legal obligations into supplier relationships.

These policies are reviewed annually and are accessible to all staff and stakeholders. In addition, we work closely with the National Joint Council (NJC) to help reduce risk by improving employee working and pay practices.

3. Assessing and managing risk

We assess modern slavery risk by:

- Mapping high-risk suppliers (e.g. cleaning, catering, recruitment)
- Identifying risks within multi-tiered supply chains for construction and imported goods.

Suppliers with elevated risk are prioritised for review and engagement.

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 and 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 with.

4. Safeguarding

We take our statutory safeguarding duties extremely seriously, striving to safeguard staff and pupils through a culture of safeguarding in everything we do. Safeguarding is led by the Principals in each school, working with Designated Safeguarding Leads, and overseen by the Trust Executive Team, via the Trust Safeguarding and Compliance Manager.

All Trust staff collaborate to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are very experienced in this area and model excellent practice for all staff. Through their encouragement, each school proactively works with the local authorities, the local safeguarding partnerships, the Local Authority Designated Officer (LADO) and other stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Good practice is shared formally amongst our schools through our safeguarding network 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 with updates taken to every meeting of the Trust Board. Safeguarding policy and practice are reviewed through school-level meetings and specific

safeguarding reviews in our schools - both internal (carried out by our Trust Safeguarding and Compliance Manager) and external (carried out by externally appointed Safeguarding consultants).

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

Each school has a Designated Safeguarding Lead who is required to understand the local safeguarding context. This is included within the policy for each school and published on each school website.

Many activities take place within our schools to raise awareness of the issues of modern slavery and child trafficking with both staff and students:

- Through Religious Education (RE), History, Geography and Drama, pupils can explore themes around modern slavery. The Humanities curriculum educates pupils on slavery from its origins, through to its abolition.
- Through their learning about Human Rights and ethical trading, pupils are encouraged to consider the impact of their individual choices and actions.
- We aim to build resilience as well as encouraging young people to make the right choices, giving them the tools to make them less vulnerable to exploitation, through our Spiritual, Moral, Social and Cultural work (SMSC) and Personal, Social and Health Education (PSHE).
- SEND students can be especially vulnerable to modern slavery due to communication difficulties and increased dependency. Schools must provide accessible safeguarding education, use clear and supportive communication, and train staff to recognise and respond to exploitation risks specific to SEND learners.
- The Trust seeks to mitigate online risks related to modern slavery by implementing strong digital safeguarding measures, such as clear Acceptable Use Policies, a robust e-safety curriculum, and regular staff training to educate students on safe online behaviour and how to report concerns.

If a case of modern slavery is identified within our school community, our safeguarding teams will coordinate a referral to the appropriate local authority or the National Referral Mechanism, and provide necessary support to victims. Our Prevent Duty work aligns closely with our modern slavery safeguarding, as we identify those vulnerable to radicalisation or exploitation through a joined-up, preventative approach.

5. Supply chain due diligence

We have undertaken a risk assessment of our supply chains, focusing on:

- Sectors with high reliance on temporary or low-paid labour
- Suppliers operating in regions with weak labour protections
- Contracts involving services like cleaning, catering, and construction.

Based on this assessment, we have prioritised monitoring and engagement with suppliers in higher-risk categories.

The Trust's Procurement and Competitive Tendering Policy sets 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 a living 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.

Procurement is subject to internal review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are considered for all tenders to provide assurance that the Trust can meet the requirements of the Modern Slavery Act (2015) by default. In the event we opt not to use an existing framework all tenders go through the Trust Head of Finance at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

We have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the Modern Slavery Act (2015). No areas of risk were identified. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking, and fully understand our duty as a Trust as prescribed in legislation.

Our due diligence processes include:

- Requiring all new suppliers to complete a Modern Slavery compliance questionnaire to confirm compliance with the Modern Slavery Act 2015
- Incorporating anti-slavery clauses in all relevant contracts
- Utilising the Modern Slavery Assessment Tool (MSAT) for high-risk suppliers
- Conducting periodic reviews and audits of supplier practices and requesting evidence when risks are identified.

If modern slavery is discovered we will:

- Collaborate with the supplier to address and rectify the issue
- Report the incident to appropriate authorities
- Consider terminating the contract if remediation efforts fail.

6. Training

We provide training to ensure staff understand and can identify signs of modern slavery:

- Mandatory annual safeguarding training for all staff includes modules on modern slavery awareness
- Procurement and HR teams receive enhanced training on ethical sourcing and recruitment
- All new employees receive induction training covering whistleblowing and ethical conduct
- Annual refresher courses are conducted to keep staff informed of best practices
- All staff receive CPD on modern slavery as part of our annual safeguarding e-learning
- Safeguarding colleagues also cover modern slavery within their CPD programme.

7. Monitoring and evaluation

To measure the effectiveness of our actions, we:

- Track the number of supplier assessments completed
- Monitor training completion rates among staff
- Review and update policies annually.

To evaluate the impact of our efforts, we have established the following KPIs:

KPI	Target (2024/25)
% of Tier 1 suppliers assessed using MSAT or equivalent	100% of high-risk suppliers
% of staff completing annual modern slavery training	95%+
% of contracts including modern slavery clauses	100% of relevant new contracts
Number of whistleblowing reports relating to modern slavery or exploitation	Zero, but monitored quarterly
Policy review completion	100% by end of financial year
Number of supplier audits conducted or reviewed where risk is flagged	At least 10 annually

Progress is reviewed by the Trust's Finance, Audit and Risk Committee and adjustments are made based on outcomes and external guidance, ensuring continuous improvement in our approach to tackling modern slavery.

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

This statement was approved by the Board of Trustees on 17th July 2025 and will be reviewed annually.

Fiona Stagg
Chair of the Trust Board
July 2025