Christ Centred, Child Centred, Catholic Educational Excellence

THE DIOCESE OF WESTMINSTER ACADEMY TRUST

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the financial year ended 31 August 2026

The Diocese of Westminster Academy Trust is a multi-academy trust ("Trust") and is also an exempt charity. It is a charitable company limited by guarantee registered in England and Wales (company number: 07944160) and is a not-for-profit educational organisation. The Trust is responsible for the leadership, governance and performance of 15 Catholic secondary and primary schools within the Diocese of Westminster, located across the London Boroughs of Brent, Hounslow and Hillingdon, and in Hertfordshire, 9,620 pupils (October 2026 census), 1,344 employees and an annual turnover in excess of £70m. It procures services and goods from third party providers predominantly based within the UK.

The Board of Directors is the legal governing board of all academies within the Trust and is regulated by the Department for Education, as the Trust's principal regulator, for the exercise of its functions and inspected by Ofsted.

Our Catholic mission

In common with the Diocese of Westminster, whose modern slavery statement was signed by Archbishop Richard Moth in July 2026, the Trust recognises the grave and enduring harm caused by human trafficking and modern slavery. Pope Francis described these abuses as 'grievous wounds in the flesh of humanity'. Pope Leo XIV, in his encyclical *Magnifica humanitas*, has asked pardon in the name of the Church for its delay in denouncing slavery, and has warned of new forms of slavery emerging in digital and economic systems. In continuity with this teaching and with Catholic social teaching, the Trust is committed to recognising and opposing trafficking and exploitation wherever they threaten the equal dignity of the human person.

As a Trust within the Diocese of Westminster, our Board of Directors and our Local Governing Bodies have adopted a zero-tolerance approach to modern slavery. We are committed to acting together as a Catholic educating community ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place

anywhere in our own organisations or in any of our supply chains acting with vigilance, transparency, accountability and practical solidarity in defence of human dignity. Through our safeguarding arrangements and partner agencies, we will also support any pupil, family member or employee who may be a victim of exploitation.

The Trust has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of the Trust and constitutes the Trust's slavery and human trafficking statement for the financial year ended 31 August 2026. It also sets out the Trust's policy on preventing modern slavery, which applies to all those working for us or on our behalf.

This Modern Slavery Statement has been approved and adopted by the Board of Directors of The Diocese of Westminster Academy Trust on 18 November 2026 and will be reviewed in November 2027.

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1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 We are confident that our policies promote good behaviour among our colleagues at work and within our Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust and of the staff, students/pupils and the communities it serves. Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in the Trust are:

1.2.1 Staff Code of Conduct 2026-2027

1.2.2 Equality and Diversity Policy (May 2025)

1.2.3 Expenses, Gifts and Hospitality Policy (Part 11 of the Finance Handbook 2025-2026)

1.2.4 Recruitment and Selection Policy (July 2026)

1.2.5 Whistleblowing Policy (July 2025)

1.2.6 Safeguarding Statement of Intent (July 2026)

1.2.7 Procurement Policy (Part 7 of the Finance Handbook 2025-2026)

1.2.8 Grievance Resolution Policy (July 2025)

1.3 We are also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Our procurement follows the Procurement Act 2023, which includes modern slavery offences among the grounds for excluding suppliers from public contracts. The Trust uses Churchmarketplace and their partner 2Buy2. Other frameworks can be used with the approval of the Chief Financial Officer.

2. RESPONSIBILITY FOR THE POLICY

2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Chief Executive Officer, as the Trust's Accounting Officer, and Headteachers at each academy within the Trust have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 The Chief Financial Officer is responsible for embedding modern slavery checks in the Trust's procurement and contract management. Designated Safeguarding Leads are responsible for responding to concerns that a pupil or other vulnerable person may be a victim of exploitation.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 The Academy's Headteacher must be informed as soon as possible if anyone believes or suspects that a conflict with this policy has occurred or may occur in the future. The Headteacher will report any concerns to the Chief Executive Officer. Concerns about non-compliance with this policy at Trust level (as opposed to Academy-level) must be raised directly with the Chief Executive Officer.

3.4 Concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier should be raised at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Headteacher at your Academy or report it in accordance with the Trust's Whistleblowing Policy as soon as possible.

3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Headteacher at your academy.

3.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Headteacher at your Academy immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Trust's Grievance Resolution Policy.

3.7 Where a concern relates to a pupil or another child or vulnerable adult, it must be reported immediately to the academy's Designated Safeguarding Lead in line with the Safeguarding Strategy September 2026-2029, the Safeguarding Statement of Intent and Keeping Children Safe in Education. The Designated Safeguarding Lead who leads on Safeguarding issues within their relevant location will refer to local authority children's social care and/or the police as appropriate, who can refer potential victims to the National Referral Mechanism.

3.8 Confidential advice is also available from the Modern Slavery & Exploitation Helpline on 08000 121 700 (free, 24 hours a day).

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our organisation faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary. All staff also receive annual safeguarding training, which covers child exploitation, including child criminal exploitation and trafficking.

4.2 A copy of the statement is published on the Trust's website.

4.3 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5.3 This policy does not form part of the employment contract of employees of the Diocese of Westminster Academy Trust.

6. DUE DILIGENCE AND RISK ASSESSMENT

6.1 We consider the risk of modern slavery within our directly employed staff to be low. Staff are recruited through safer recruitment processes, including identity, right-to-work and enhanced DBS checks, and are paid in line with national pay and conditions.

6.2 We have identified the following areas as carrying a higher risk of modern slavery in our supply chains: outsourced cleaning and catering, construction, maintenance and estates works; agency and supply staff; school uniform, sportswear and other goods manufactured overseas; and IT and electronic equipment.

6.3 Because we work with children and young people, we also recognise the risk that pupils may be exploited, including through child criminal exploitation and county lines, and we address this through our safeguarding arrangements.

7. APPROVAL

This statement was approved by the Board of Directors on 18 November 2026 and is signed on its behalf by:

P Leeson
Chair of the Board of Directors,
The Diocese of Westminster Academy Trust
Date: 18 November 2026