

UNITY SCHOOLS PARTNERSHIP

MODERN SLAVERY POLICY STATEMENT 2025-26

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Protocol/ Guidance Details	
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1. Policy statement

Modern slavery is a crime and a serious violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking, and may involve exploitation that a person cannot refuse or leave because of threats, coercion, deception, abuse of power or vulnerability. Unity Schools Partnership has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically, transparently and with integrity in all its activities, employment practices and supply-chain relationships.

This statement sets out the steps UnitySP takes, and will continue to take during 2025-26, to prevent modern slavery from occurring in our own organisation and in our supply chains. It is prepared with regard to section 54 of the Modern Slavery Act 2015, the Home Office's statutory Transparency in Supply Chains guidance, relevant safeguarding guidance for schools, and public sector procurement expectations under the Procurement Act 2023 and associated government guidance on tackling modern slavery in supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

We recognise that modern slavery risks may arise in education settings through recruitment, agency staffing, facilities management, cleaning, catering, estates works, IT equipment, uniform, educational supplies and other procured goods and services. We also recognise the safeguarding risks associated with child exploitation and trafficking. Our approach is therefore linked to our safeguarding, safer recruitment, whistleblowing, procurement, conflicts of interest, disciplinary and supplier management arrangements.

2. Responsibility for the policy

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

The Deputy CEO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, responding to queries, co-ordinating assurance activity, and ensuring that appropriate systems and controls are in place to prevent, identify and respond to modern slavery risks. Allegations or indicators of modern slavery in UnitySP's operations or supply chains will be investigated promptly, with safeguarding, HR, procurement, legal and external advice sought where appropriate.

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.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Deputy CEO.

3. Compliance with the policy

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

The prevention, detection and reporting of modern slavery in any part of our business 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.

You must notify your Designated Safeguarding Lead, line manager, Director of HR or the Deputy CEO as soon as possible if you believe or suspect that modern slavery, human trafficking or exploitation has occurred, may be

occurring, or may occur in the future. Concerns relating to a child must be handled in accordance with UnitySP's safeguarding and child protection procedures and the current statutory guidance for schools.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier 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 your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 your DSL, Director of HR or the Deputy CEO.

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 Director of HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Where a concern involves a potential victim of modern slavery, UnitySP will take a victim-centred approach. We will avoid action that could place a person at further risk, preserve relevant information, follow safeguarding and whistleblowing procedures, and seek advice from appropriate statutory agencies or specialist services where required.

4. Training & Communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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.

Procurement and contract management processes will include proportionate checks for modern slavery risk. This may include reviewing supplier modern slavery statements where applicable, using relevant exclusion grounds, considering higher-risk sectors and geographies, including appropriate contractual obligations, and seeking assurance that suppliers have effective policies, due diligence, training and reporting arrangements in place. For higher-risk contracts, UnitySP may require additional information, action plans or monitoring during the life of the contract.

UnitySP will continue to carry out pre-employment and safer recruitment checks in line with statutory guidance and will maintain appropriate controls to identify unusual employment arrangements, including shared addresses or bank details where these may indicate a safeguarding, fraud or exploitation concern. Any such checks will be handled proportionately and in accordance with data protection requirements.

5. Breaches of this policy

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

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

Further information and advice:

- Trust head office: 01440 333400
- Home Office website: <https://www.gov.uk/government/collections/modern-slavery>
- Modern Slavery website: <https://www.modernslaveryhelpline.org/report>
- Modern Slavery helpline: 08000 121 700

6. References used in preparing this statement

- [Modern Slavery Act 2015](#), section 54: transparency in supply chains.
- Home Office statutory guidance, [Transparency in supply chains: a practical guide \(Dec25\)](#)
- [Cabinet Office Procurement Policy, Tackling Modern Slavery in Government Supply Chains \(Oct25\)](#)
- Department for Education statutory guidance, [Keeping children safe in education 2026](#), in force from 1 September 2026.