



GREENWOOD ACADEMIES TRUST

Trust Modern Slavery and Human Trafficking Statement

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Table of Contents

1. Statement of Commitment
2. Purpose
3. Organisation Profile
4. Legal and Regulatory Framework
5. Safeguarding and Child Protection
6. Supply Chains and Procurement
7. Risk Assessment and Due Diligence
8. Recruitment and Employment Practices
9. Policies, Procedures and Training
10. Roles and Responsibilities
11. Reporting Concerns and Whistleblowing
12. Monitoring and Assurance
13. Future Commitments
14. Related Documents
15. Statement Approval
16. Reference Sources

1. Statement of Commitment

Greenwood Academies Trust is committed to acting ethically, with integrity and transparency in all aspects of its operations and supply chains.

The Trust has a zero-tolerance approach to modern slavery, servitude, forced labour, compulsory labour and human trafficking. The Trust recognises its responsibility to take appropriate and proportionate steps to identify, prevent, mitigate and respond to the risks of modern slavery within its organisation, academies and supply chains.

This statement sets out the steps taken by Greenwood Academies Trust and its academies during the financial year ended 31 August 2026 to prevent modern slavery and human trafficking within supply chains or any part of Trust activity.

2. Purpose

The purpose of this statement is to:

- demonstrate the Trust's commitment to preventing modern slavery and human trafficking;
- comply with the requirements of the Modern Slavery Act 2015;
- provide assurance to Trustees, staff, pupils, parents/carers, suppliers and stakeholders;
- explain the controls in place across recruitment, safeguarding and procurement activities;
- support awareness and understanding of modern slavery risks; and
- outline the Trust's future commitments to continuous improvement.

3. Organisation Profile

Greenwood Academies Trust operates a family of academies serving approximately 19,000 pupils across multiple local authority areas and employs more than 3,000 members of staff. The Trust provides education and associated support services through its academies and central services functions.

The Trust recognises that modern slavery risks may arise through:

- safeguarding concerns affecting children and young people;
- exploitation of vulnerable adults;
- recruitment and employment practices;
- labour provision arrangements; and
- supply chain activities associated with the procurement of goods, services and works.

4. Legal and Regulatory Framework

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015.

The Trust also recognises its responsibilities under:

- safeguarding legislation and statutory guidance;
- employment legislation;
- public procurement legislation;
- health and safety legislation;

- whistleblowing protections; and
- equality and human rights legislation.

The Trust expects all suppliers, contractors, service providers and partners to comply with applicable legislation and maintain standards consistent with the principles of the Modern Slavery Act 2015.

5. Safeguarding and Child Protection

Protecting children and young people is central to the Trust's approach to modern slavery prevention.

The Trust recognises that child criminal exploitation, child sexual exploitation, trafficking and other forms of abuse can have a direct impact on pupils and their families. Academy safeguarding arrangements are therefore an important control in identifying and responding to concerns.

Staff are required to follow academy safeguarding procedures and report concerns through established safeguarding reporting arrangements. Appropriate safeguarding training is available to staff, including training relating to exploitation, trafficking and modern slavery risks.

6. Supply Chains and Procurement

The Trust procures a wide range of goods, services and works, including:

- facilities management and maintenance services;
- catering services;
- ICT equipment and support services;
- educational resources and equipment;
- construction and capital works;
- cleaning services; and
- temporary and agency staffing provision.

The Trust seeks to ensure that suppliers operate ethically and in compliance with relevant legislation. Procurement activity is undertaken in accordance with the Trust's Financial Regulations, Procurement Policy, the Procurement Act 2023 and applicable public procurement requirements.

Suppliers may be required to demonstrate compliance with modern slavery legislation and provide assurance regarding the controls they have in place within their own organisation and supply chains. Where appropriate, the Trust may consider mandatory or discretionary exclusion grounds relating to modern slavery offences when undertaking procurement activity. The Trust reserves the right to exclude or take action against suppliers where there is evidence of non-compliance with applicable legislation or contractual obligations relating to modern slavery.

The Trust may seek assurance throughout the life of a contract where modern slavery risks are considered elevated.

7. Risk Assessment and Due Diligence

The Trust adopts a proportionate and risk-based approach to identifying areas where there may be an increased risk of modern slavery. Particular attention may be given to:

- labour-intensive services;
- temporary workforce provision;
- construction projects;
- cleaning and facilities services;
- catering services; and
- supply chains involving imported goods.

Risk considerations may form part of procurement, contract award and contract management activities. Where concerns are identified, appropriate escalation, review and remedial action will be undertaken.

8. Recruitment and Employment Practices

The Trust is committed to responsible recruitment practices and maintaining fair employment standards.

The Trust undertakes recruitment checks to help ensure that individuals have the legal right to work in the United Kingdom and are employed in accordance with applicable legislation. Recruitment and onboarding arrangements are designed to reduce the risk of exploitation and unlawful employment practices.

The Trust complies with relevant UK employment legislation and working time requirements and seeks to ensure that all workers are treated fairly, consistently and with dignity and respect.

Agency and temporary workers are expected to be sourced through compliant procurement routes and employment agencies that meet relevant legal and safeguarding requirements.

9. Policies, Procedures and Training

The Trust maintains a number of policies and procedures that contribute to the prevention of modern slavery and human trafficking. These include:

- Procurement Policy;
- Recruitment, Selection and Disclosure Policy;
- Safeguarding and Child Protection Policy;
- Whistleblowing Policy;
- Risk Management Policy;
- Health and Safety Policy; and
- Code of Conduct and related employment policies.

The Trust is committed to ensuring that staff receive appropriate training and awareness information relevant to their roles. Training opportunities are available through learning platforms and safeguarding training programmes, including content relating to trafficking, exploitation and modern slavery awareness.

10. Roles and Responsibilities

Role	Trust expectation
Board of Trustees	Approves this statement and seeks assurance that appropriate controls are in place.
Executive Leadership Team	Provides strategic oversight and promotes compliance across the Trust.
Chief Operations and Sustainability Officer	Maintains this statement, oversees procurement arrangements and reports significant issues through governance routes.
Chief People Officer	Oversees recruitment and employment controls.
Principals	Ensure safeguarding and local operational arrangements are effectively implemented.
All staff	Remain alert to signs of exploitation and report concerns promptly through appropriate channels.

11. Reporting Concerns and Whistleblowing

The Trust encourages all staff, contractors, volunteers and stakeholders to raise concerns where they believe modern slavery, trafficking or exploitation may occur.

Concerns may be reported through:

- safeguarding procedures;
- designated safeguarding leads;
- line management arrangements;
- Trust reporting routes; or
- the Trust Whistleblowing Policy.

Reports will be treated seriously and investigated appropriately.

12. Monitoring and Assurance

The Trust monitors compliance through a range of governance and assurance activities, which may include:

- procurement reviews;
- internal audit activity;
- policy compliance reviews;
- safeguarding assurance processes;
- supplier evaluations and due diligence activities; and

- reporting through governance committees and Board structures.

Any significant concerns identified through these arrangements are reviewed and addressed through appropriate management and governance processes.

13. Future Commitments

During the next reporting period the Trust will:

- continue to promote staff awareness of modern slavery risks;
- maintain access to relevant safeguarding and exploitation training;
- review supplier assurance arrangements where appropriate;
- maintain appropriate procurement controls and due diligence processes;
- monitor developments in legislation and best practice; and
- continue to strengthen understanding of modern slavery risks across Trust operations and supply chains.

These actions support the Trust's commitment to continuous improvement and responsible organisational governance.

14. Related Documents

- Procurement Policy;
- Financial Regulations;
- Recruitment, Selection and Disclosure Policy;
- Safeguarding and Child Protection Policy;
- Whistleblowing Policy;
- Risk Management Policy;
- Health and Safety Policy;
- Staff Code of Conduct;
- Supplier Terms and Conditions.

15. Statement Approval

This statement has been approved by the Greenwood Academies Trust Board of Trustees and will be reviewed annually.

16. Reference Sources

This statement has been developed with reference to the Modern Slavery Act 2015, the Procurement Act 2023, Home Office Transparency in Supply Chains statutory guidance, Trust procurement and governance arrangements, Trust safeguarding arrangements, Trust recruitment and employment procedures, and government guidance relating to modern slavery and human trafficking.