SLAVERY AND HUMAN TRAFFICKING STATEMENT

Version control	
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Date of next review:	December 2026	**Owner:**	Director of HR & Compliance
Type of policy:	Trust Network	**Approving Body:**	Trust Board

1. Introduction and statement of intent

1.1 This statement has been approved by the Aspirations Academies Trust Board of Trustees and is made pursuant to section 54(1) of the Modern Slavery Act 2015. The statement covers the activities of the Trust, including the 16 academies it sponsors.

1.2 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

1.3 The Aspirations Academies Trust (Aspirations / the Trust) recognises and is committed to upholding the requirements of the Modern Slavery Act 2015 (the Act).

1.4 The Trust is committed to combatting modern slavery and human trafficking within the Trust and its supply chains. To uphold this commitment Aspirations will:

- Raise awareness of modern slavery and human trafficking within its academies;
- Maintain a zero-tolerance approach to modern slavery and human trafficking along with a commitment to acting ethically and with integrity in all business dealings and relationships;
- Expect external suppliers and contractors to abide by this statement. Aspirations will carry out appropriate due diligence in accordance with the Procurement Policy to evaluate the modern slavery and human trafficking risks of each new supplier to ensure the Trust does not knowingly enter a business relationship with a non-compliant organisation.

1.5 Furthermore, Aspirations recognises that the prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working form the Trust or on the Trust's behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

2. Organisation structure and supply chains

2.1 Aspirations is a multi-academy trust. In that capacity, it acts as one employer across all the academies, which it sponsors. The principal objects of the Trust are as set out in its Articles of Association. In summary, it is to advance for the public benefit education in the United Kingdom, in particular maintaining, carrying on, managing and developing schools offering a broad and balanced curriculum. The Trust sponsors 16 academies situated in southern England.

2.2 The Trust is a company limited by guarantee and an exempt charity. The charitable company's Memorandum and Articles of Association are the primary governing documents of the Academy Trust. The Trustees of Aspirations Academies Trust are also the Directors of the charitable company for the purposes of company law. The Board of Trustees is the legal governing body of all academies sponsored by the Trust and remains accountable in law and to OFSTED and the Department for Education for the exercise of its functions. The Trustees are appointed on a voluntary basis, are drawn from the public and private sector, and bring significant educational and other professional expertise.

2.3 The Trust works primarily with UK based suppliers and contractors and employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our

commitment to treating employees ethically and with integrity. When considering the organisation's activities, we believe that the risk of slavery and human trafficking is low.

3. Policies in relation to slavery and human trafficking

3.1 We have reviewed our existing policies and procedures in the light of the Act. 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, its staff and the students/pupils and the communities it serves.

3.2 Among the policies that we consider give us strength in avoiding modern slavery or human trafficking are:

- Code of Conduct;
- Equal Opportunities Policy;
- Procurement Policy;
- Safer Recruitment Policy (included within the Safeguarding and Child Protection Policy);
- Whistleblowing Policy;
- Complaints Policy

4. Due diligence processes

4.1 Trustees, governors, executive directors and academy principals, with assistance from the HR & Compliance team, are responsible for investigating any suspected instances of modern slavery and human trafficking.

4.2 Risk management is embedded throughout the Trust's operations, with any significant risks identified and mitigations being shared with the Trustees through the Audit and Risk Committee. The Trust engages with an independent Internal Audit service that reviews and reports on adherence to policies and procedures. Non-compliance, if identified, is reported to the Board of Trustees through the committee.

5. Risk assessment and management

5.1 The Trust has assessed its risks of modern slavery and human trafficking and has included below specific activities that may be considered as a risk to the Trust:

High Risk – Given the nature of the operations of the Trust, we do not believe there to be any activities that would constitute high risk either within the Trust or our supply chain.

Medium Risk – Supply Chains linked to the external provision of catering and cleaning. The supply of uniform where the contracted supplier uses an overseas company for manufacturing.

Low Risk – Contractors using subcontractors on large Capital projects. Risks are mitigated through the tender process.

5.2 In view of the most notable areas of risk of modern slavery and human trafficking relating to activity of the Trust being through contracted services, in managing the risk the Trust places particular emphasis on the robustness of its procurement policy and procedures.

6 Measuring effectiveness of steps being taken

6.1 When reviewing the Modern Slavery Statement annually, the Board of Trustees will consider reports from the Trust's executive team to be satisfied that relevant policies and procedures (see 3.2 and 5.2) are up to date and being implemented effectively.

7 Training on modern slavery and trafficking

7.1 Trustees have discussed the Act, its purpose and the Trust's commitment to combatting modern slavery and human trafficking at a Board of Trustees meeting and commit to do so annually.

7.2 The Trust's position has been presented to the Executive Operational Board and all academy principals and they have been challenged to continue to consider where the risk of modern slavery or human trafficking may arise in the Trust and take action to report this and take appropriate action.