

## The Athelstan Trust Modern Slavery Statement

### Introduction

The Athelstan Trust is a multi-academy Trust consisting of six secondary schools and four primary schools in Wiltshire, Gloucestershire and South Gloucestershire. We currently employ over 800 people and educate over 5,000 pupils. This statement sets out the steps the Trust has in place to prevent modern slavery and human trafficking within our organisation and supply chains. The Trust is committed to acting ethically and with integrity in all business operations, ensuring that our practices are aligned with our responsibilities under the Modern Slavery Act 2015.

The Trust employs teaching, support and administrative staff, and we work with a range of suppliers that provide goods, services and works. We consider the overall risk of modern slavery within our direct workforce to be low but recognise appropriate measures should be in place to manage this. We also recognise the potential for risks within supply chains, particularly those involving facilities management, construction, ICT equipment, and outsourced services.

### Our Commitment

The Trust is committed to ensuring that modern slavery, in all its forms, has no place in our operations or supply chains. We expect all staff, suppliers, contractors and partners to share this commitment.

### Policies and Controls

We maintain a range of internal policies and procedures that support our efforts to identify, prevent and address modern slavery risks. These include:

- **Child Protection and Safeguarding Policy** – setting out our responsibilities and arrangements to protect children from exploitation.
- **Financial Regulations Policy** – outlining requirements for purchasing, due diligence, and supplier standards. This is supported by our Antibribery and Corruption Policy which further outlines specific requirements.
- **Recruitment and Selection Policy (including safer recruitment practices)** – ensuring all necessary pre-employment checks are completed, including verifying identity, right to work, and references.
- **Staff Code of Conduct** - setting out our expectations of employee conduct and ethical behaviour.
- **Whistleblowing Policy** – enabling staff to raise concerns confidentially about any wrongdoing, including potential modern slavery issues, without fear of retaliation.

These policies are regularly reviewed to ensure they remain effective and compliant with legislation.

## **Supply Chains**

We expect suppliers to operate ethically, comply with the Modern Slavery Act 2015, and ensure that slavery and human trafficking are not present within their own businesses or supply chains. As part of our new supplier process, we request that suppliers confirm adherence to the Modern Slavery Act. Where appropriate, we incorporate contractual clauses requiring suppliers to maintain high standards, report any concerns, and take corrective action where necessary.

## **Training and Awareness**

We recognise the importance of equipping staff with the knowledge to identify and report potential modern slavery concerns. Key staff involved in recruitment, procurement, contract management and safeguarding receive targeted training.

## **Monitoring and Review**

The Trust monitors compliance with relevant policies and supplier standards through ongoing contract management and periodic review. Where concerns are identified, we take prompt action, which may include conducting further investigation, working with suppliers to address deficiencies, or terminating relationships where necessary.

We are committed to continuous improvement and will review our approach annually to strengthen our practices and address emerging risks. This includes considering additional supplier checks, expanding training, and enhancing reporting mechanisms.

## **Reporting Concerns**

Any concerns relating to modern slavery, whether within the Trust or in our supply chains, should be reported through our Whistleblowing or Safeguarding procedures. All reports are taken seriously, handled sensitively, and investigated thoroughly.

## **Approval**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Trust's Modern Slavery Statement for the financial year. It was approved by the Trust Board and will be reviewed and updated annually.

Signed by the Chair of Trustees

Name: Keval Shah

Signed:



Date of issue: March 2026

Signed by the CEO

Name: Matthew Evans

Signed:



Date of Review: March 2027