



Modern Slavery and Human Trafficking Statement

TPAT Policy Management

Document history

Review date	Version	Reviewer / owner	Executive approval	Approving body	Meeting date of policy approval
11/2023	1	DFO and Deputy CEO	11/2023	Trust Board	04/12/2023
11/2024	2	CEO CFO	26/11/2024	Trust Board	09/12/2024
05/2026	3	CEO CFO	05/2026	PWC	28/09/2026

Material changes since last publication

Section	Changes
	Substantive rewrite / changes.

This statement is reviewed annually. The next review is due by September 2027.

1. Introduction

The Park Academies Trust ("the Trust") is committed to upholding the highest ethical standards in our operations and supply chains. We unequivocally oppose modern slavery, forced labour, bonded labour, human trafficking, and child labour. This statement outlines our approach to ensure that neither slavery nor human trafficking exists within our Trust.

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

2. Our Structure, Business and Supply Chains

Organisation structure

The Trust operates eight academies across Swindon. It is governed by a Board of Trustees.

Operations

The Trust provides primary, secondary and sixth form education. Its operations also include central administration and finance, estates management, information technology, catering, cleaning, maintenance and other support services.

At 31 August 2026, the Trust employed approximately 650 people. The Trust also engaged agency workers, contractors and service providers.

The principal supply chain categories include the following, who are predominately UK based suppliers:

- Catering and food supplies
- Cleaning and facilities services
- Construction, maintenance and estates projects
- Recruitment agencies and temporary staffing
- Information technology hardware, software and telephony
- School uniforms, textiles and footwear
- Educational equipment and resources
- Transport and educational visits
- Waste management and utilities
- Professional and consultancy services

The Trust recognises increased risk within labour intensive services, temporary and agency work, construction, cleaning, catering, electronics, textiles and multi-tier international supply chains.

3. Our Approach to Procurement and Supplier Standards

Through appropriate tendering and the use of frameworks, the Trust's procurement processes aim to eliminate any risk of modern slavery being in our supply chain. We expect all suppliers to be and remain compliant with all relevant UK laws and regulations. Where a supplier fails to meet these standards or refuses to make necessary improvements, we reserve the right to terminate the relationship.

Frameworks we use are provided by public sector buying organisations and other public sector institutions and are designed to meet the requirements of the Modern Slavery Act 2015. If we choose not to use an existing framework, all material tenders are managed through the CFO, ensuring modern slavery risks can be assessed and incorporated into the process.

Annually we will undertake a desk-based review of key suppliers' modern slavery statements to confirm ongoing compliance with the Act. Our staff receive training and guidance on procurement practices to help prevent modern slavery and human trafficking. We recognise our responsibilities under legislation and embed these principles across our operations. Additionally, safeguarding colleagues include modern slavery awareness within their continuing professional development programme.

4. Relevant Policies and Processes

We maintain a robust policy framework that supports anti-slavery commitments, including:

- **Whistleblowing Policy** – Staff raise concerns confidentially.
- **Procurement and Contracts Policy** – Mandates ethical supply chain practices.
- **TPAT Standard Terms and Conditions** – Include relevant legal compliance and anti-slavery provisions.
- **Safer Recruitment and Single Central Record** – Ensure all staff and agency workers are appropriately vetted.
- **Staff Code of Conduct, Safeguarding and Child Protection Policy** – Reinforce awareness and responsibilities.

5. Due Diligence and Risk Management

The Trust recognises that modern slavery risks can vary depending on sector, geography, and the complexity of supply chains.

Key risk factors

- **Workforce risk** – Agency, temporary, low-paid, migrant and subcontracted workers face increased vulnerability where recruitment arrangements, deductions, working hours or accommodation lack transparency.
- **Sector risk** – Certain outsourced services, such as catering, cleaning, and construction, often involve low-paid, temporary, or seasonal labour, which can increase vulnerability to exploitation and unethical recruitment practices.
- **Geographic risk** – Some products, such as uniforms and IT equipment, may be sourced from regions where labour protections are weaker and forced labour is more prevalent.

These supply chains can involve multiple tiers of subcontracting, reducing transparency and increasing risk.

- **Spend and complexity** – High-value contracts and multi-tier supply chains present additional challenges, as visibility decreases further down the chain.

Our mitigation measures include

- **Supplier onboarding checks** – All new suppliers must provide, or it is obtained from their website, evidence of their own anti-slavery policies or statements. This is focussed on suppliers supplying over £50k worth of goods or services per annum.
- **Contractual clauses** – The Trust reserves the right to audit suppliers and terminate agreements where breaches occur.
- **Recruitment controls** – Internally, we apply rigorous checks to verify identity and right to work documentation for all staff and agency workers. Recruitment agencies engaged by the Trust must adhere to our Safer Recruitment Policy and demonstrate compliance with UK employment law.
- **Reporting and responding to concerns** – Modern slavery concerns are referred promptly to the appropriate safeguarding, HR, procurement or senior leadership lead. The Trust prioritises the safety and welfare of any potential victim. Where appropriate, the Trust will involve the police, local safeguarding authorities, the Fair Work Agency or other relevant agencies.

Supplier concerns are investigated and addressed through an agreed action plan. Suspension or termination will remain available for serious, criminal, repeated or unresolved breaches. The Trust will consider the impact of its response on affected workers before ending a supplier relationship.

Going forward we plan to introduce risk based audits, where we conduct audits on suppliers identified as high risk based on sector, geography, and spend. These reviews cover labour practices, recruitment processes, and subcontractor arrangements.

6. Training and Awareness

Building awareness among staff is critical to preventing modern slavery. We have built the following into our annual training cycle for appropriate staffing:

- **Mandatory safeguarding training** – All staff receive annual safeguarding training, which includes modules on recognising signs of exploitation and trafficking. This ensures that awareness is embedded across the organisation.
- **Specialist training for key personnel** – Staff involved in procurement and HR receive targeted training on identifying modern slavery risks in supply chains and recruitment processes.
- **Governor and Trustee briefings** – Delivered annually as part of Finance, Audit and Risk Committee responsibilities.
- **Whistleblowing guidance** – We actively promote our Whistleblowing Policy, ensuring staff understand how to report concerns confidentially. Information is available on our Hub and communicated during induction and refresher sessions.

7. Monitoring Effectiveness

Governance oversight

Internal audit is carried out on the procurement and financial processes in the Trust. The CFO oversees procurement and supplier due diligence. Assurance on significant risks, control weaknesses and planned improvements is reported to the relevant committee and the Trust Board.

Supplier and Contract list

The Trust continues to develop a centralised, approved supplier and contract list. This list is created through a rigorous vetting process that will ensure suppliers meet our compliance standards before any transactions take place. Going forward we are building into the onboarding process for suppliers the requirement to confirm that they adhere to the Modern Slavery Act 2015 and provide evidence of their own policies and procedures. Only suppliers who pass these checks are added to the list, meaning every purchase or contract is with an organisation that has been assessed and approved. This approach reduces risk, improves transparency, and ensures that modern slavery considerations are embedded in all procurement decisions.

Use of the approved supplier list does not replace the Trust's obligations under the Procurement Act 2023, the Procurement Regulations 2024, the Academy Trust Handbook, the Trust's Procurement Policy or its Scheme of Delegation.

Where the Procurement Act requires a covered procurement, the Trust will follow an appropriate competitive procedure or purchase through a lawfully established framework or dynamic market. Inclusion on the approved supplier list does not give a supplier exclusivity, guarantee future work or remove the need to demonstrate value for money.

The CFO monitors the approved supplier list and contract register. Suppliers with expired checks, unresolved concerns or serious compliance failures are suspended or removed, subject to appropriate investigation, remediation and consideration of the impact on affected workers.

8. Future Commitments

- Review suppliers on at least an annual basis to ensure we have a copy of their Modern Slavery Statements, as a minimum requirement. For all suppliers where spend is £50k per annum or greater.
- Expand modern slavery awareness training to contractors and volunteers across the Trust.

9. Approval

The People and Wellbeing Committee reviewed this statement on 28 September 2026 and recommended it to the Trust Board.

The Trust Board approved this statement on 7 October 2026.