

Statement of Modern Slavery and Human Trafficking



Trinity Multi-Academy Trust

Introduction to Trinity MAT's Statement of Modern
Slavery and Human Trafficking

Lead: Chief Operating Officer

Item	Detail
Policy	Statement of Modern Slavery and Human Trafficking
Citation reference	Trinity Multi-Academy Trust (n.d.) <i>Statement of Modern Slavery and Human Trafficking. Policy.</i>
Assigned school(s)	Trust-wide
Status	Statutory
Lead professional	Chief Operating Officer
Date of review	September 2026
Date of next review	September 2027

1. Introduction

- 1.1 This statement constitutes the Modern Slavery and Human Trafficking Transparency Statement for Trinity Multi-Academy Trust (TMAT) and is made in accordance with Section 54 of the Modern Slavery Act 2015.
- 1.2 TMAT is committed to acting ethically and with integrity in all its activities and relationships. We take a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation within our organisation and our supply chains.
- 1.3 This statement outlines the steps the Trust continues to take to identify, assess and reduce the risk of modern slavery occurring within our operations and procurement processes during the 2025/26 academic year.

2. About Trinity Multi-Academy Trust (TMAT)

- 2.1 Trinity Multi-Academy Trust was established in 2015 and currently comprises ten academies, providing education from the primary phase through to post-16 provision.
- 2.2 The Trust has grown steadily and continues to work collaboratively to deliver high-quality education. As a Church of England Multi-Academy Trust, we welcome schools of all faiths and none.
- 2.3 Our mission is: "To make a positive difference to the lives of as many young people as possible."
- 2.4 This ethos underpins our commitment to ethical conduct, safeguarding and responsible procurement.
- 2.5 Governance and Oversight
- 2.6 The Board of Directors has overall responsibility for ensuring that Trinity Multi-Academy Trust operates in accordance with its legal and regulatory obligations, including those set out in the Modern Slavery Act 2015.
- 2.7 The Board provides strategic oversight of the Trust's approach to ethical conduct, safeguarding and risk management. Responsibility for monitoring the effectiveness of the Trust's internal control environment, including compliance with relevant legislation and policies, is delegated to the Audit and Risk Committee.
- 2.8 Senior leaders are responsible for implementing the Trust's policies and procedures and ensuring that appropriate systems are in place to identify and mitigate the risk of modern slavery or human trafficking occurring within the Trust's operations or supply chains.
- 2.9 The Trust's internal scrutiny arrangements provide independent assurance to the Board that risk management, governance and internal controls are operating effectively. Any concerns identified through internal review processes are reported to the Audit and Risk Committee and addressed through appropriate action plans.

3. Risk Management and Assessment

- 3.1** The Trust maintains a formal risk management framework that identifies and monitors strategic and operational risks.
- 3.2** Key features include:
- A documented risk management strategy;
 - Oversight by the Audit and Risk Committee;
 - Regular review by the Board of Directors;
 - Internal scrutiny through the Trust's internal audit programme.
- 3.3** Internal auditors undertake periodic testing of financial controls, procurement procedures and compliance with Trust policies. Any identified weaknesses or non-compliance are reported to senior leaders and the Audit and Risk Committee.
- 3.4** The Trust also maintains a Whistleblowing Policy, which enables employees and others to report concerns about misconduct or unethical behaviour, including potential modern slavery offences.

4. Procurement and Supply Chain Management

- 4.1** The Trust recognises that risks associated with modern slavery may exist within certain sectors used in education procurement. These include:
- Construction and building maintenance;
 - Catering services and food supply;
 - Cleaning services;
 - Grounds maintenance;
 - ICT and technology supply chains;
 - School uniform manufacturing;

- Stationery supply;
- Agency and supply teaching staff.

4.2 To mitigate these risks, TMAAT undertakes due diligence when engaging suppliers and contractors. Our approach includes:

- Requiring suppliers to confirm compliance with the Modern Slavery Act 2015;
- Reviewing suppliers' ethical trading policies;
- Including modern slavery compliance clauses within contracts;
- Ensuring contractors confirm right-to-work checks and DBS checks where relevant;
- Considering ethical trading practices during tender evaluation processes.

4.3 Where construction projects are undertaken, contractors are required to ensure that all subcontractors also comply with modern slavery legislation.

4.4 The Trust will terminate supplier relationships where serious breaches of modern slavery requirements are identified.

5. Policies and Procedures

5.1 TMAAT operates a range of policies that support our commitment to safeguarding and ethical employment practices, these include:

- Safeguarding and Child Protection Policy;
- Safer Recruitment Policy;
- Whistleblowing Policy;
- Code of Conduct for Staff;
- Procurement Procedures;
- Equality and Dignity at Work Policies.

5.2 The Trust's Safeguarding and Child Protection Policy recognises modern slavery and trafficking as forms of abuse and exploitation. Staff are trained to recognise indicators that a child may be at risk and to report concerns through established safeguarding procedures.

5.3 Each academy has:

- A Designated Safeguarding Lead (DSL);
- A Safeguarding Governor;
- Regular safeguarding reporting to the Local Governing Body.

5.4 Staff receive annual safeguarding training and regular updates on emerging safeguarding risks.

6. Recruitment and Employment Practices

6.1 The Trust operates safer recruitment procedures in accordance with statutory guidance, including Keeping Children Safe in Education (KCSIE) issued by the Department for Education.

6.2 All appointments within the Trust are subject to appropriate pre-employment checks to ensure that individuals are suitable to work with children and young people. These checks include, but are not limited to:

- An enhanced Disclosure and Barring Service (DBS) check, including barred list information where appropriate;
- Verification of the individual's identity and right to work in the United Kingdom;
- Confirmation of qualifications and professional status where required;
- Obtaining satisfactory references;
- Additional checks for individuals who have lived or worked overseas, where applicable.

- 6.3** Each academy and the central Trust team maintains a Single Central Record (SCR) of recruitment and vetting checks, in line with statutory requirements. The SCR is subject to regular internal review and oversight by senior leaders and governance bodies to ensure compliance with safeguarding legislation.
- 6.4** The Trust is also approved by the UK Home Office as a licensed sponsor, enabling it to recruit specialist staff through the Skilled Worker visa route where appropriate. Maintaining this status requires the Trust to comply with UK immigration law and sponsor duties, including maintaining appropriate employment records and reporting requirements. The Trust may be subject to inspection or audit by the Home Office to confirm ongoing compliance.
- 6.5** Through these procedures, the Trust seeks to ensure that all staff are recruited and employed in a manner that safeguards pupils and supports the Trust's commitment to preventing exploitation, including modern slavery and human trafficking.

7. Culture and Training

- 7.1** TMAF promotes a culture of ethical conduct and safeguarding across all academies and central services.
- 7.2** All staff receive:
- Annual safeguarding training;
 - Updates on emerging safeguarding risks;
 - Access to online training modules through platforms such as EduCompli and iHASCO.
- 7.3** Training includes awareness of:
- Indicators of modern slavery and exploitation;
 - Reporting concerns through safeguarding processes;
 - Ethical procurement and supply chain responsibilities.

- 7.4** Staff involved in procurement and supplier management may receive additional training on modern slavery risks within supply chains.

8. Planned Activities

8.1 During the 2025/26 academic year, the Trust will continue to:

- Raise awareness of modern slavery risks among central teams and school business managers;
- Review supplier contracts and procurement processes;
- Monitor compliance with modern slavery legislation;
- Ensure relevant staff complete training on ethical procurement and modern slavery;
- Monitor updates from the Department for Education and UK Government regarding safeguarding, procurement and employment guidance.

8.2 The Trust will continue to review and strengthen its procedures where necessary.

9. Approval of the statement

9.1 This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Trinity Multi-Academy Trust slavery and human trafficking statement for the 2025/26 academic year.

Prof David Baker (Chair of the Board of Directors)

Signed:



Date: 1st September 2026