



Modern Day Slavery & Human Trafficking Policy & Statement 2025-2026

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1. Rationale and Statutory Requirements

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. The Trust has a legal obligation under Section 54 of the Modern Slavery Act 2015 to publish an annual slavery and human trafficking statement.
- 1.3. The Trust has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.
- 1.4. This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Community Inclusive Trust (the Trust) and the suppliers it contacts with to prevent modern slavery and human trafficking in its education arms, business units and supply chains.
- 1.5. The Trust and associated schools are all committed to ensuring there is transparency throughout our Trust and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Scope

- 2.1. This policy and accompanying annual statement applies to all persons working for the Trust or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2. It applies to all procurement activity, from low-value transactional purchasing to high-value tenders and includes all categories of supply (such as estates, maintenance, catering ICT hardware, uniforms, educational consumables, cleaning, travel).
- 2.3. It covers all Trust operations, including safeguarding, HR, IT, governance, finance and estates functions.

3. Responsibility for the policy

- 3.1. The Trust Board has overall responsibility for ensuring this policy and accompanying annual statement in place and the Executive Leadership Team have day-to-day responsibility to ensure compliance with our legal and ethical obligations. The Chief Finance & Operations Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.2. Head Teachers, Department Heads and any staff member that has a direct report has a responsibility for ensuring those reporting to them understand and comply with this policy, and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. Compliance with this statement and policy

- 4.1. Staff must ensure that they read, understand and comply with this policy.
- 4.2. The prevention, detection and reporting of modern slavery in any part of our Trust or supply chains is the responsibility of all those working with and for CIT. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3. Staff must notify their Head Teacher, Line Manager, Procurement & Analytics Manager or the Chief Finance & Operations Officer as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 4.4. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our Trust or supply chains of any supplier tier at the earliest possible stage.
- 4.5. If a member of staff believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or the Chief Finance & Operations Officer, or may report it in accordance with our Whistleblowing Policy as soon as possible.
- 4.6. If a member of staff is unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with their Head Teacher, Line Manager or the Chief Finance & Operations Officer.
- 4.7. The Trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Trust is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern

slavery of whatever form is or may be taking place in any part of our own Trust or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the HR Director immediately. If the matter is not remedied, and they are an employee, they should raise it formally using the Grievance Procedure which can be found on the Trust Intranet or from the HR department.

5. Training

- 5.1. The Trust reminds all employees and volunteers on an annual basis of the values included within its Code of Conduct and receives acknowledgement of the Code from its freelancers, consultants and suppliers. The Trust's HR team and associated support staff are trained to ensure, through our rigorous recruitment checks, that the Trust does not employ people who are under-age or who do not have the right to work in the UK. The Trust's contracts continue to adhere to the European Working Time Directive.
- 5.2. Additional training on this policy, and on the risk our Trust faces from modern slavery in its supply chains, will be provided as and when necessary, outside of the normal period and for any new staff joining the Trust.
- 5.3. The Trust's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

- 6.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2. The Trust will terminate our relationship with immediate effect with other individuals and organisations working on our behalf if they are found to be in breach of this policy.

7. Governance & Monitoring

- 7.1. This policy and accompanying statement have been approved in full by the Community Inclusive Trust Board of Trustees, pursuant to the fulfilment of its obligations under section 54(1) of the Modern Slavery Act 2015.
- 7.2. Modern slavery risks are reviewed and updated through the year, ensuring that they are assessed alongside wider organisational risks and internal control mechanisms.

- 7.3. Any concerns, risks or issues identified during the year are escalated promptly and appropriately through line management to senior leadership and, where necessary, to the Trust Board for oversight, assurance and action.
- 7.4. This policy will be formally reviewed on an annual cycle, or earlier if significant changes are required.

8. Modern Day Slavery & Human Trafficking Statement 2025-2026

8.1. About this Statement and our commitment

This statement is made pursuant to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and sets out the steps Community Inclusive Trust has taken during the year to prevent modern slavery and human trafficking in our operations and supply chains.

It has been approved by the Trust Board and signed by a Director/Trustee, and it is published on our website via a clear link on the homepage in line with Home Office guidance.

We recognise the global and UK-wide presence of modern slavery and adopt a zero-tolerance approach. We are committed to continuous improvement, taking action beyond compliance to identify, manage and remedy risks, and to provide responsible, victim-centred support to those affected.

8.2. Our Organisation

The Community Inclusive Trust provides Nursery, EYFS, primary, secondary and special education to a community of children and young people, as well as vocational, apprenticeship and teacher training opportunities. The Trust is the over-arching body responsible, with schools located across the East Midlands.

The Trust's academies are geographically focused across Lincolnshire, Leicestershire and Nottinghamshire. The Trust's central office is located in Long Bennington, Lincolnshire. Each academy is led and run operationally by its Headteacher. Centrally led support function teams across finance, human resources, IT, governance, procurement, estates and facilities deliver activities relating to these functional areas as a service to the academies. The Trust employs circa 1,200 staff, working across its 20 school sites. In addition to directly employed staff, the Trust engages some agency staff, particularly teachers and education support staff, and some colleagues delivering activities in our academies are employees of outsourced service suppliers, in particular catering staff, cleaners and some sports coaches. The Trust buys a range of goods and services from suppliers across a broad range of spend categories. Suppliers range from large companies to small local businesses and the spend per supplier can range from several £m per year to very low values. Most suppliers are UK-based, although for certain goods and supplies, manufacturing of the goods is likely to occur overseas.

8.3. Risk Assessment

The Trust has assessed the risks of modern slavery and human trafficking as follows:

8.3.1. **High risk activities:** The Trust does not believe there to be any high-risk operations within the Trust or within their supply chain with regards to modern slavery and human trafficking.

8.3.2. **Medium risk activities:** Supply chains linked to the catering and cleaning provisions because of the Trust's use of external contractors. Supply chains linked to the manufacture of ICT equipment and school uniforms, because of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

8.3.3. **Low risk activities:** Provision of agency staff, predominantly in teaching and support staff.

8.4. Policies in relation to Slavery and Human Trafficking

The Trust reviews policies and procedures on a routine basis to ensure they remain legally compliant and fit for purpose. The following policies and procedures are key in meeting the requirements of the Modern Slavery Act.

- **Safeguarding and Child Protection Policy:** The Trust embraces its responsibility to develop, implement and monitor policies and procedures to safeguard and promote the welfare of children. The Trust Safeguarding and Child Protection Policy incorporates all statutory guidance as required in 'Keeping Children Safe in Education' as it is updated, as well as 'Working Together to Safeguard Children 2023' and 'Modern Slavery: statutory guidance for England and Wales 2025'. All academies are required to supplement the Trust Safeguarding and Child Protection Policy with contextualised information including the respective local authority safeguarding partnership, such that safeguarding leaders at the academy can refer concerns that children might be at risk of exploitation. All local academy appendices to the Trust Safeguarding and Child Protection Policy include the contextual safeguarding risks of child exploitation. The Trust Policy and local appendices are reviewed annually at least, as required, and all Trustees, governors, staff and volunteers are expected to read and comply with its instructions.
- **HR/Employment Policies and Practices:** The Trust is highly committed to advancing equality, eradicating unfair treatment, and promoting good relations across and between all our communities. We have clear and rigorous HR policies and procedures, and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation. The Trust has procedures and policies in place on all major employment issues, for example, disciplinary, grievance, harassment and bullying, code of conduct, whistleblowing procedures, as well as other policies and procedures that support fair treatment of employees, including attendance management and ill health capability, performance capability, performance management, recruitment and selection.

- **Recruitment Policy:** The Trust's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensure the Trust confirms new employees' identities and qualifications. All Trustees, governors and staff are required to have an enhanced disclosure and barring service (DBS) check which details all criminal history, cautions, warnings, reprimands and convictions held on the Police National Computer. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and completed in writing.
- **Codes of Conduct:** The Trust's Codes of Conduct for employees, and for Trustees and governors, make clear the actions and behaviours expected of them when representing the Trust. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour, and breaches are investigated. This applies to all persons working for the Trust or on its behalf in any capacity, including employees at all levels, directors, Trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.
- **Whistleblowing:** The Trust operates a Whistleblowing Policy aimed principally at our employees, but also available to our suppliers, which encourages the reporting of any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated and appropriate remedial action taken. The Trust's Anti-Fraud and Anti-Corruption Policy reinforces the principles of ethical working practices.

8.5. Embedding Modern Day Slavery and Human Trafficking Considerations into Procurement and Supplier Management

The Trust seeks excellence in every area of the organisation and strives to ensure the highest standards of professionalism, integrity and ethical business practice. We are committed to conducting our business in a lawful manner and this includes engaging with our suppliers to ensure that they share our high standards.

We buy a wide range of external goods and services including construction services and supplies, furniture and stationery, electronics (computers, audio visual, etc.), food and catering supplies, travel services, laboratory supplies (equipment, chemicals, etc.), books, cleaning services, printing and waste and recycling services, and do so in accordance with public procurement law. A large proportion is bought through Trust frameworks and frameworks established by collaborative consortia.

We expect our suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act. Modern Slavery and Human Trafficking are included within our new supplier risk assessment and due diligence procedures. We have continued to build upon our existing systems to identify, assess and monitor potential risk in our supply chains. The Trust reserves the right to exclude any bidder, contractor or service provider who has been convicted of an offence under the Modern Slavery Act 2015.

8.6. Improvements During the Reporting Period

The Trust has remained firmly committed to continually reviewing and improving its practices to ensure modern slavery is in no way a part of its operations. The Trust has implemented various control measures to increase our oversight of ethical procurement and recruitment which includes but is not limited to:

- Effective communications with our suppliers to confirm their understanding and compliance in line with our expectations. All new supplier forms include a modern slavery and human trafficking clause for the supplier's confirmation prior to the Trust using them as a supplier.
- The centralised procurement policy has been reviewed with Trust Board approval which includes modern slavery and human trafficking information as part of the approved tender process.
- Modern slavery and human trafficking clauses have been included within our standard terms and conditions.
- Specific training on modern slavery risks for all groups of staff to ensure that any potential risks are identified and mitigated.

9. Approval

This Modern Day and Human Trafficking Policy and Statement was approved by the Board of Trustees in April 2026.