



Modern Slavery statement

Our Statement

This statement is made on behalf of Swale Academies Trust (company number 07344732) with regards to the Modern Slavery Act 2015 (the Act). This statement is published in accordance with section 54 of the Act and relates to the financial year September 2024 to August 2025. This document will be reviewed on an annual basis.

We do not condone or enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Scope

This statement is applicable to all of our Trust's operations and supply chain and to all those with whom we have a working or commercial relationship.

Organisation Structure

Swale Academies Trust is a multi-academy trust established under the Academies Act 2010. We are a company limited by guarantee and an exempt charity, the memorandum and articles of association are our primary governing documents. The Trustees of the Trust are also the directors for the purposes of company law.

The Chief Executive will hold the Executive and Senior Leadership Teams within individual schools responsible for taking steps to ensure this policy is promoted, understood and implemented by all employees and any individuals who may represent or deliver our services.

All employees and representatives of our Trust are responsible for taking steps to promote the principles of this policy to help prevent slavery and human trafficking.

Recruitment

Our Trust conducts all its recruitment processes in line with Keeping Children Safe in Education and our own Safer Recruitment Policy which lays out processes for recruiting staff and thoroughly checking that they are legally entitled to work in the UK.

Our suppliers

Our current contractors and suppliers are predominantly based in the United Kingdom. When procuring goods and services relating to higher risk categories we will use reasonable endeavours to encourage and ensure suppliers can, wherever possible, demonstrate their compliance to the Act.

Our supply chains includes:

- Education equipment, textbooks and resources
- Student and staff uniform suppliers

- Estates and facilities management
- ICT equipment and services
- Catering services and supplies
- Cleaning services and supplies
- Supply/agency staff.

We purchase goods and services in line with the Academy Trust Handbook, which ensures compliance with legislation and best practice.

Policies

We continuously review our policies and procedures. The policies that we consider gives us strength on avoiding modern slavery or human trafficking under the Act are:

- Safer Recruitment
- Whistleblowing
- Child Protection and Safeguarding
- Equality Statement
- Anti-Fraud and Corruption
- Acceptance of Gifts and Hospitality
- Financial Regulations

Risk assessment and management

We have identified areas which carry the greatest risk in relation to modern slavery and human trafficking, these alongside any modern slavery controls that are in place to mitigate risk will be included in all reviews of the risk register.

Next steps

We commit to taking the following steps during the next academic year:

- Circulate this statement to all employees to raise awareness.
- We will continue to build on the work already undertaken to develop our understanding on modern Slavery and human trafficking ensuring we respond appropriately.
- Key policies will be updated in line with our policy framework to include, where appropriate, reference to the Act.
- Promote on-line learning around relevant areas.
- Develop the Risk register to ensure modern slavery and controls are identified
- We will continue to use stringent safer recruitment guidelines for all appointments, ensuring the same procedure is followed for all posts.
- Pay policy reviewed annually to ensure pay reflects the national minimum wage guidance.
- Ensure best practice is followed during the procurement process.
- Optimise the use of Public Sector purchasing frameworks
- Review contracts and suppliers, working with them to ensure supply chains are monitored and appropriate action is taken.

This statement has been approved by the Swale Academies Trust Board on 8th October 2024



Mike Wilson
Chief Executive Officer
22nd September 2025