Modern Slavery Statement 25-26

Introduction

This statement is made on behalf of West Norfolk Academies Trust's (company number 07546118) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the year September 2025 – August 2026.

West Norfolk Academies Trust recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensure that its supply chains are free from slavery and human trafficking.

This statement sets out the Trust's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its business and supply chains.

Structure, business, and supply chains

West Norfolk Academies Trust is a multi-academy trust (MAT), based in West Norfolk. A full list of our academies can be found on the West Norfolk Academies Trust's website.

West Norfolk Academies Trust has two principal areas of operations:

- A whole trust level which oversees the organisation as a whole
- A local level – e.g. an individual academy

Our suppliers are UK based, and key supply areas cover catering, maintenance/repairs, IT supplies, agency staff and cleaning.

Our approach

We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our charitable and business relations.

Policies, documentation, and key relationships

The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Complaints Policy
- Whistleblowing Policy and Procedure
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy
- Child Protection and Safeguarding Policy
- Code of Conduct
- Purchasing and Tendering policy
- Finance Manual
- Supplier Terms and Conditions

In addition, we work closely with the National Joint Council (NJC) to help reduce risk by improving employee working and pay practices.

Our Finance and General Purposes committee has overall oversight of the processes and practices embedded within the West Norfolk Academies Trust to reduce Modern Slavery, ensuring our supply chains, which rely on people, can demonstrate adherence with local and national laws and regulations, including paying the minimum wage. The members of the Committee work together with the Personnel Committee and the Audit & Risk Committee as appropriate on these areas.

Identifying and addressing risks

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact West Norfolk Academies Trust. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract with.

Safeguarding

We take safeguarding seriously, upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Trust safeguarding lead who oversees primary and secondary as well as Designated Safeguarding Leads in each of our schools. We also have attendance officers in our schools that continuously monitor our student's presence in the lessons, around school and in alternative provisions. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are highly experienced in this area and model excellent practice for all staff.

Through their leadership, each school proactively works with the local authorities, through multi agency working, for example, with the local safeguarding partnerships (LSCG, Local safeguarding core group), the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation, domestic abuse, modern slavery and human trafficking. Best practice is shared across all of our academies and the focus of safeguarding training always includes training on early identification of those at risk of abuse and exploitation.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice are reviewed at Trust safeguarding meetings and at school level,

and the Trust safeguarding lead provides evidence and assurance to the Executive Leadership Team. In addition, the Executive Leadership Team provide regular reports to the full board on Attendance, Safeguarding and behaviour throughout the academic year.

Statutory safeguarding practices and impact on keeping children safe are formally reviewed by the Trust safeguarding lead and audited through Quality Assurance processes.

Safeguarding and attendance are agenda items on the audit and risk committee meetings with an update then provided from that meeting going to the full Trust Board. Our board feels that all members have full responsibility for Safeguarding.

Our Trust Safeguarding Policy is reviewed annually by the Executive Leadership Team and approved by the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE).

Due to the differing demographics within our schools, each school Designated Safeguarding Lead is required to understand the local safeguarding context.

Supply chain

West Norfolk Academies Trust's purchasing and tendering policy sets out the requirements we have regarding engagement with suppliers. Our suppliers are required to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS (Disclosure & Barring Service) check. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are considered for all tenders and these meet the requirements of the Modern Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders go through the tendering committee at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria. Safeguarding colleagues also cover modern slavery within their CPD programme.

Key performance indicators to measure effectiveness of steps being taken

Training

Every member of staff is trained on the Safeguarding policy and is required to declare annually that they have read and understood the policy. In addition, West Norfolk Academies trust has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law to raise these concerns in confidence, without fear of repercussion.

Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus on early identification of those at risk of exploitation along with training to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that, through our robust safeguarding training, staff could identify and act appropriately for at risk pupils, staff, and contractors.

This is not an area for complacency, and we keep our safeguarding policy and practice under close scrutiny and evaluation. We continually enhance the knowledge of our staff to prevent slavery and

human trafficking and child sexual exploitation. Safeguarding awareness sessions for modern slavery and trafficking at academy level are included within our staff safeguarding CPD plan.

We evaluate our processes for raising concerns, to ensure that there are clearly identified ways, available to all users of our estates, to report whistleblowing or modern slavery concerns.

Reporting

To date, no referrals have been made in relation to modern slavery.

Reviewed by: Board of Trustees
Approved: 21 October 2026
Next review date: September 2027