



POLICY	Modern Slavery and Human Trafficking Policy and Statement
STATUS/DATE OF THIS VERSION	March 2026
APPROVED BY	Trust Board
RATIFIED BY	Trust Board- 24 March 2026
REVIEW	March 2027

This policy is operated by all the schools in Unity Education Trust (as listed below).

There may be sections that are specific to one school and these will be added by the school either as an annex or in place of yellow highlighted sections below.

Any queries about the policy should be directed, in the first instance, to the Headteacher/Head of School:

- Beeston Primary
- Garvestone Primary
- Grove House Infant
- Kings Park Infant
- Northgate High School and Dereham Sixth Form College
- UET Compass Belton Academy
- UET Pathfinder Douglas Bader Academy
- The Pinetree School
- Churchill Park
- Greyfriars Primary
- Highgate Infant School
- Kings Oak Infant School
- Wimbotsham and Stow Primary
- Magdalen Primary
- St Germans Primary

Modern Slavery and Human Trafficking Policy and Statement for the financial year 2025/6

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and constitutes the slavery and human trafficking statement of the Unity Education Trust.

This policy does not form part of any employee’s contract of employment, and it may be amended at any time following consultation. We may also vary any part of this procedure, including time limits, as appropriate in any case.

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. 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.

We are also committed to ensuring there is transparency in our own business 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, and 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

This policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, workers, agency workers, trainees, apprentices, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, collectively referred to as ‘staff’ for the purposes of this policy.

Responsibility for the policy

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Head of Governance, Compliance and Corporate Support 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.

Line managers at all levels are responsible 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.

Structure and Business of the Organisation

Unity Education Trust (UET) is a Multi-Academy Trust based in Norfolk comprising 16 schools, 750 employees and circa 2,750 pupils and built on developing likeminded schools to outstanding and beyond through collaborative working that develops a unity of purpose in all that we do. The Trust has an annual turnover of £36,037,597 for the financial year 2024/25.

The Trust sets high expectations in every aspect of our work, providing pupils with the best opportunities through outstanding teaching, the development of 21st century facilities, inspirational leadership and a growth mindset approach.

We will ensure that each of our academies maintains its unique identities at the heart of their communities and engaging with all partners and stakeholders and other high performing educational organisations.

UET's Trust Board sets and monitors the Trust's strategic direction and monitors the effectiveness of the institution's management.

Further information regarding UET's governance arrangements and financial performance can be found here:

Financial Statements; <https://unityeducationtrust.uk/key-documents-policies/>

Structure of UET Governance; <https://unityeducationtrust.uk/trustees/>

Due Diligence and Compliance with the policy

Staff and suppliers must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If anyone believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with our Whistleblowing Policy, or that of their direct employer, as soon as possible.

Staff requiring guidance 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, should raise it with their manager or the Chief Financial and Operations Officer.

We aim 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. We are 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 business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, victimisation, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Governance, Compliance and Corporate Support immediately. If the matter is not remedied, and affects an employee, it should be raised formally using our Grievance Procedure.

Communication and awareness of this policy

As part of the induction process for all individuals who work for us, employees are advised where this policy can be found on UET website and Staff Noticeboard; a copy of this statement will be provided

in writing to anyone who requests one within 30 days of receiving their request. Guidance and advice are available from the Head of Governance, Compliance and Corporate Support.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face potential disciplinary action, which could result in dismissal.

We will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

UET Modern Slavery Statement 2025-26

This first statement is made on behalf of Unity Education Multi-Academy Trust (UET company number 10591822) 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.

Modern slavery remains a crime that affects millions of individuals around the world. The Modern Slavery Act 2015 defines these offences as those of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

At UET, we are committed to ensuring that modern slavery is not tolerated and encourage all those employed by the Trust, or associated with it, to take a proactive approach to tackling this type of crime.

Trustees at the Trust have not had cause to believe that modern slavery practices have occurred within the Trust or within its supply chains but remain keenly aware of the need for continued vigilance.

Because the Trust works primarily with UK-based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst the Trust does not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically.

The Trust is committed to the highest standards of ethical conduct in all our activities and to making continuous improvements in this area. We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high 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 of our charitable and business relations.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the Trust and within our supply chains to ensure that the organisation is fully compliant with the Modern Slavery Act 2015.

1. Structure and supply chains

UET is a multi-academy trust comprising a range of nursery, infant, primary, secondary, specialist and complex needs schools across Norfolk. UET was established in 2017.

As of 2024, its family of schools have expanded providing education for 3 - 19-year-olds across mainstream and alternative provision settings and now comprises the following:

- Grove House Infant
- Kings Park Infant
- Highgate Infant School
- Kings Oak Infant School
- Beeston Primary
- Garvestone Primary
- Greyfriars Primary
- Wimbotsham and Stow Primary

- Magdalen Primary
- St Germans Primary
- Northgate High School and Dereham Sixth Form College , DESA Soccer Academy
- UET Compass Belton Academy
- UET Pathfinder Douglas Bader Academy
- The Pinetree School
- Churchill Park

The Trust's main business operations are in the provision of education. It is supported by a large number of suppliers of various sizes, the vast majority of which are entirely UK-based. Key supply areas cover catering, buildings maintenance/repairs, grounds management, school agency staff and cleaning.

2. Policies in relation to slavery and human trafficking

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Trust maintains a Modern Slavery Policy published on the Trust's website, reflecting this commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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.

- Procurement Policy.
- Complaints Policy.
- Grievance Policy.
- Whistleblowing Policy and Procedure.
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy.
- Child Protection and Safeguarding Policy.
- Staff Code of Conduct.
- Supplier terms and conditions.

The Board approves the above policies annually and both internal and external auditors scrutinise processes.

These policies reinforce the Trust's commitment to safer recruitment and promote each employee's duty to raise concerns in relation to wrongdoing and criminality.

The Trust encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Whistleblowing Policy is designed to make it easy for employees to make disclosures, without fear of retaliation

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

Our People Committee has overall oversight of the process and practices embedded within UET to reduce Modern Slavery and in 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 Finance and Audit Committee as appropriate on these areas.

3. Due diligence processes

UET's Procurement policy 2025-2026 strongly reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls, including in relation to combatting modern slavery and human trafficking in our supply chain. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Extensive due diligence activities already take place at schools that are due to join the Trust. Detailed HR and contracts information is gathered as part of this, and any irregularity is challenged prior to conversion, then addressed upon conversion if it is outstanding.

The Trust also recognises that there is a risk of modern slavery occurring within our own workforce, both permanent and temporary. The Finance and Operations Directorate seeks through its robust recruitment and selection policies and its ongoing training and support to reduce the risks of modern slavery in our workforce.

4. Risk assessment and management

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact UET. 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.

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

High risk activities

The Trust do 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.

Medium risk activities

- Supply chains linked to the building repairs and maintenance, grounds management, catering and cleaning provisions as a consequence of the Trust's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the Trust's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

Low risk activities

- Provision of agency staff predominantly in teaching and support staff.
- In regard to employee recruitment - Trustees deem the risk of systemic modern slavery within the Trust itself to be **very low**. This is because recruitment to the Trust takes place within a highly professional framework and employees and volunteers are subject to legal checks, including Right to Work and DBS. Trustees are, however, clear that even one instance of modern slavery is one too many and are clear on the need to maintain vigilance. Safeguarding. UET take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. Our Director of Education and Director of Specialist Provision work across the Trust as well as Designated Safeguarding Leads in every academy. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are incredibly experienced in this area and model excellent practice for all staff. Through their

encouragement, each academy proactively works with the local authorities, the local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared amongst the academies, and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

- The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Statutory safeguarding practices and impact on keeping children safe are formally reviewed by the central team. Safeguarding is an agenda item at every full Board of Trustees Meeting, and we have a named Trustee with portfolio responsibility for Safeguarding. Our UET Child Protection and Safeguarding Policies are reviewed annually by the Executive Leadership Team and the Board of Trustees and are fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE 2025). Due to the geographical spread of our academies, each academy Designated Safeguarding Lead is required to understand the local safeguarding context. This is included within the policy for each academy and published on each academy website. Every member of staff, whether or not they are based in an academy, is trained on the policy (either in person or via E-Learning) and is required to declare annually that they have read and understood the policy and their training. In addition, UET also 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 disciplinary action. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk pupils, staff, and contractors.
- The Trust recognises that it is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services. UET's procurement regulations set out the requirements we have in relation to our engagement with suppliers. Our suppliers are expected 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. We publish our standard terms and conditions to ensure providers looking to contract with us are aware of our standards. 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 Chief Financial Officer at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria. Trustees deem the risk of systemic modern slavery within the Trust's supply chains to be **low** overall.

5. Recruitment, Training for staff and fair pay

The Trust operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines. Recruitment processes are subject to inspection and audit.

The majority of the Trust's staff are employed directly on a permanent or fixed term basis.

All employees and volunteers who join the Trust are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure, address and right-to-work checks.

For roles covered by agency workers, the Trust will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the agency that the checks have been conducted and the outcomes are satisfactory. The agencies themselves will have been subject to our rigorous supplier verification process which includes due diligence on their organisation. All staff have received training in Part 1 of Keeping Children Safe in Education, which includes reference to child criminal exploitation.

The Trust is committed to ensuring that all directly employed and contracted staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, whether employed directly, as contractors or through our subcontractors, receive at least the appropriate National Minimum Wage.

6.Measuring Effectiveness

The Trust strives to maintain the highest standards of employee conduct and ethical behaviour, and our policies enhance our commitment to act ethically and with integrity throughout our schools. Policies and procedures are kept under review to make sure they reflect the changing needs of the Trust and of the staff, students and the communities it serves.

7.Reporting


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

8.Future Actions

- The Trustees have/will discussed the Act, its purpose and UETs attitude to it at a Board meeting and have alerted the Executive Leadership team to it. We have challenged the ELG to consider where the risk of modern slavery or human trafficking may arise within UET,
- As part of our initiative to identify and mitigate risk, we will incorporate a review of controls undertaken by our suppliers.
- We will/have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking and fully understand our duty as a Trust as prescribed in legislation namely in the form of E-Learning.
- Throughout the year the annual safeguarding training plan across the Trust will/ includes a detailed focus upon on early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks. Safeguarding colleagues also cover modern slavery within their CPD programme.
- Every member of staff, whether or not they are based in an academy, will be trained on the policy, via the E-Learning module on Smart Log, and is required to declare annually that they have read and understood the policy and their training.
- This statement and policy will be published on all UET schools' websites as well as on the UET Statutory Policies and Publishing Requirements table and internal Staff Information Board. These statements will be retained on websites
- This statement and policy will be uploaded to the Government Modern Slavery Registry to share the steps UET is taking to prevent modern slavery in its own and supplier organisations.
- The HOGCCS will join the business group of the Norfolk Anti-Slavery Network to collaborate with colleagues across the region in improving our approach to Modern Slavery.

9. Statement Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Trust's Modern Slavery and Human Trafficking statement for the financial year ending 31 August 2026. This statement was agreed by Trustees on 24TH March 2026 and constitutes the Trust's modern slavery statement for the financial year ending 31 August 2026



John Baumber
Chair of UET Trust Board of Trustees
Date 24/3/26



Glyn Hambling
UET CEO
Date 24/3/26



UET Modern Slavery Action Plan 2025-26

Objective	Actions	Lead(s)	Completion Date and Impact
Every member of staff, whether or not they are based in an academy, is/will be trained on the policy (either in person or via e-learning) and is required to declare annually that they have read and understood the policy and their training.	eLearning available via SMARTLOG on Modern Slavery and will be incorporated into INSET day training	HoGCCS DoE	Nov 2026 Impact; all staff and stakeholders aware of areas of risk and appropriate actions to take
Throughout the year the annual safeguarding training plan across the Trust will/ includes a detailed focus upon on early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks			Ongoing Impact; all staff and stakeholders aware of areas of risk and appropriate actions to take
This statement and policy will be published on all UET schools' websites as well as on the UET Statutory Policies and Publishing Requirements table and internal Staff Information Board.	Publication following Trustee ratification of Policy and Statement	HoGCCS	March 2026 Impact; all staff and stakeholders aware of areas of risk and appropriate actions to take
This statement and policy will be uploaded to the Government Modern Slavery Registry		HoGCCS	April 2026 Impact; transparency of practices in relation to Modern Slavery. Deterrent to potential perpetrators
The XXX will/has joined the business group of the Norfolk Anti-Slavery Network to collaborate with colleagues across the region in improving our approach to Modern Slavery			

			Impact; consistent and improving approaches across the region as a deterrent
We will/have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking		CFOO	