

Greenshaw Learning Trust

Modern Slavery and Human Trafficking Statement

The Greenshaw Learning Trust is a charitable company limited by guarantee registered in England and Wales, company number 7633694, registered at Greenshaw Learning Trust, ORU Sutton, Throwley Way, Sutton, SM1 4AF.

Policy Title	GLT Modern Slavery and Human Trafficking Statement	
Category	Trust Policy	
Responsible Officer	Chair of the Board of Trustees	
Approved on	19 December 2025	
Minor technical or operational updates made	Name	Date
Review Cycle and next approval date	Three years December 2028	
Monitoring arrangements	This policy will be reviewed every three years, or sooner if required by statutory guidance updates. The implementation of this policy will be reviewed annually by the Headteacher.	
Associated Policies Internal Policy Library Published GLT Policies <i>For school policies please visit the school website</i>	● GLT Whistleblowing Policy. ● GLT Safeguarding Policy. ● GLT Finance & Procurement Policies. ● GLT Staff Code of Conduct.	
This Policy is based on or takes into account the following legislation and guidance		

Greenshaw Learning Trust

Slavery and Human Trafficking Statement 2025/26

Terminology

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher, executive headteacher or principal of the school/academy.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service means the services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a school Headteacher. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher should be read as the GLT CEO.
- Governance Colleague means a Trustee or Community Governance Committee (CGC) member.
- Responsible Officer means the member of the Director Team to which responsibility for the management of the policy, procedure or statement has been delegated by the Board of Trustees
- Policy or Policies should be read as including any procedures, reports, templates, models, statements and schedules etc. as specified in the GLT Policy Schedule. Categories of Policy are defined in 'Scope and Applicability'

Scope & Applicability

- It is the responsibility of the Headteacher of each school, and the GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff follow this Policy and all Policies and Procedures across the Trust.
- If there is any question or doubt about the interpretation or implementation of this Policy, the 'Responsible Officer' or the GLT CEO should be consulted.
- Unless otherwise stated, all Policies apply to all schools within the Trust, all Trust employees (including temporary and agency staff), all pupils, all trustees and committee members (including members of community committees), all volunteers, and all visitors and contractors
- This is a Trust Policy. The GLT Board of Trustees has approved a set of Trust-wide policies and procedures. A Trust-wide policy/procedure is a single policy/procedure that must be followed by all schools and services in the Trust.

Introduction

This policy statement is made by the Board of Trustees of the Greenshaw Learning Trust pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the Trust's Modern Slavery Act Transparency Statement for the financial year ending August 2026.

It was approved by the Board of Trustees on 19 December 2025.

The Statement is the responsibility of the GLT Chief Executive Officer.

This Statement applies to the Greenshaw Learning Trust as a whole and to all the schools and service units in the Trust, to their Governance Colleagues, staff and volunteers, and to external contractors,

consultants and suppliers. Where this statement refers to a Headteacher, this should be read as the CEO for the Trust Shared Service.

The Greenshaw Learning Trust is committed to preventing slavery and human trafficking in all corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

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.

Organisational structure and supply chains

The Greenshaw Learning Trust is an academy trust, a charitable company with the sole purpose of advancing education by maintaining and developing academy schools, to provide comprehensive and inclusive education for the public benefit, funded by the Department for Education.

The Trust recognises its responsibility to tackle modern slavery throughout its supply chains. The Trust's supply chains include the procurement of: uniform; catering, cleaning, caretaking and grounds maintenance services; furniture and equipment; ICT hardware; and construction.

Responsibilities

The Board of Trustees has overall responsibility for ensuring this statement complies with the Trust's legal and ethical obligations, and that all those under its control comply with it.

The Headteacher has primary and day-to-day operational responsibility for ensuring that this policy statement is complied with in respect of their school.

The GLT Head of Procurement has responsibility for implementing the policy and for monitoring and auditing internal control systems to ensure this statement is adhered to.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and receive adequate and regular training regarding modern slavery in supply chains.

Governance Colleagues and staff involved in procurement are responsible for ensuring that this policy is complied with in the Trust's supply chains.

Relevant policies

The following Trust policies and procedures are directly related to and complement this Policy:

- GLT Whistleblowing Policy.
- GLT Safeguarding Policy.
- GLT Finance & Procurement Policies.
- GLT Staff Code of Conduct.

Compliance with the policy statement

The Board of Trustees is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015, and to taking steps to understand potential modern slavery risks within its business, and to ensure that there is no slavery or human trafficking taking place in its business and its supply chains.

All Governance Colleagues, members of staff and volunteers, external contractors, consultants and suppliers of the Greenshaw Learning Trust must read, understand and comply with this statement. They must:

- Avoid any activity that might lead to, or suggest, a breach of this statement.
- Notify their Headteacher as soon as possible if they believe or suspect that a conflict with this statement has occurred or may occur in the future.
- 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 they believe or suspect a breach of this statement has occurred or may occur, notify their Headteacher or report it in accordance with the GLT Whistleblowing Policy as soon as possible.
- If the Headteacher believes or suspects a breach of this statement has occurred or may occur they must notify the GLT Head of Procurement.

If there is any doubt about whether a particular act, the treatment of a person more generally, or their working conditions within the Trust or any tier of the Trust's supply chains may constitute any of the various forms of modern slavery, the matter should be raised with the GLT Head of Procurement.

Enhanced Due Diligence

The Trust has reviewed its current practice and as a result will:

- Require all members of staff with procurement responsibilities to complete training on modern slavery to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.
- Raise awareness of modern slavery issues with members of staff, volunteers and Governance Colleagues by sharing information and appropriate training, including:
 - the basic principles of the Modern Slavery Act 2015;
 - how members of staff can identify and prevent slavery and human trafficking;
 - what members of staff can do to flag up potential slavery or human trafficking issues with the relevant people within the organisation; and
 - what external help is available, for example through the Modern Slavery Helpline.
- Review the Trust's procurement policies and procedures to ensure that they are able to identify the risk of slavery and human trafficking and ensure that there is no slavery and human trafficking in the Trust's business or supply chains.

- Review the Trust's existing contracts and suppliers to ensure that slavery and human trafficking is not taking place in its supply chains.
- Develop a system for supply chain verification to ensure that potential suppliers are not allowing slavery or human trafficking to take place.
- Evaluate and monitor the effectiveness of the steps taken by the Trust to ensure slavery and human trafficking is not taking place in GLT schools, service units or supply chains.



Anne Spackman

Chair of the Board of Trustees

Date: 19 December 2025
