Excalibur Academies Trust

Modern Slavery and Human Trafficking Statement 2026-2027

Version	Author	Created	Updated
11.2026	HR	November 2025	November 2026

Date of approval	Approved by	Last Review date	Next Review date
November 2026	Staffing Committee Signed: Nick Lewis CEO	November 2026	November 2027

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1. Introduction

1.1 This statement sets out Excalibur Academies' Trust's actions to understand all potential modern slavery risks related to its business and the steps we take to ensure there is no slavery or human trafficking in our business and supply chains.

1.2 We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our organisation and supply chain. We all have a responsibility to be alert to the risks. All staff are expected to report concerns and managers to act on them.

2. Organisational Structure

2.1 Excalibur Academies Trust (EAT) is a Multi-Academy Trust operating in the Southwest region, along the M4 corridor reaching from Bristol to Reading. Our principal activity is the provision of primary and secondary education in 20 academies. A list of our schools can be found on the EAT website.

3. Our Business

3.1 Our Shared Services model provides human resources, financial services, specialist advice and guidance support for EAT schools including Health & Safety, SEND & Inclusion, Safeguarding, Governance and GDPR.

4. Our Approach

4.1 Excalibur Academies Trust has zero-tolerance of any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and expect our supply chain, contractors, employees, volunteers and all other business partners to do the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

5. Our Policies, Documentation and Key Relationships

5.1 The following policies and documents detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery. These include:

5.1.1 Employment Manual – sets our expectations for employee behaviour and details for the Modern Slavery helpline;

5.1.2 Equality, Diversity and Inclusion Statement and Strategy - sets out the Trust's foundations of opportunity, fairness and inclusion as cornerstones of our approach;

5.1.3 Child Protection and Safeguarding Policy & Safeguarding Handbook – provides clear reporting channels for staff;

5.1.4 Safer Recruitment Guidance – provides guidance on agency staff checks;

5.1.5 Whistleblowing Policy – we encourage all employees, volunteers and suppliers to report any suspicion of slavery or human trafficking. The policy protects staff who raise concerns about supply chain risks.

5.1.6 Supplier compliance by agreed and signed supplier code of conduct;

5.1.7 Procurement Process within the Finance Policy – Sets out the requirement for all our contractors to have their own Modern Slavery Statement, unless exempt from publishing.

5.2 Our Staffing and Finance Committees have oversight of our practices to prevent Modern Slavery from entering our supply chains, and to ensure adherence with employment laws and regulations, including paying the minimum wage.

6. Identifying and Addressing Risks

6.1 We recognise that there are two main areas of risk through which modern slavery could impact the Trust. The first is through child sexual exploitation of human trafficking which can directly impact our pupils, staff, or contractors. This also potentially affects the staff of our contractors. This is managed through robust processes and procedures including safeguarding and safer recruitment practices. The second is through our supply chain. Our procurement processes manage risk with the supply chain, as set out below.

7. Procurement and Supply Chain

7.1 We are committed to transparency in our business, and to ensuring our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same standards from our contractors, suppliers and business partners. Our procurement and contracting processes ~~to~~ include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same standards.

7.2 While we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act, we will endeavour to eliminate the risks as much as possible. We will do this by ensuring that our procurement process, supplier code of conduct and contractual terms include specific provision relating to all relevant UK legislation.

7.3 We will require all new suppliers to confirm they abide by the Modern Slavery Act 2015 via our supplier code of conduct. This includes requiring all suppliers to attest that they comply with all relevant UK legislation.

7.4 Approved Supplier Frameworks will also be used when suitable, to tender only with suppliers which have been pre-vetted/approved by the DfE.

8. Safeguarding & Staff Training

8.1 Modern Slavery and trafficking are both forms of abuse and therefore fall within our safeguarding policies and procedures.

8.2 All employees undertake Safeguarding and Child Protection training which includes understanding of modern slavery. Employees are individually responsible for ensuring they are familiar with the signs and indicators of modern slavery and that they are aware of our safeguarding policies and procedures so that they can respond appropriately. Line managers must ensure that safeguarding training is kept up to date.

8.3 All Trustees undertake Safeguarding and Child Protection training in line with our requirements set out in our Training Handbook. This also applies to Governors and volunteers at our academies.

8.4 We also use the National referral mechanism when reporting modern slavery concerns. Report modern slavery – Report modern slavery – GOV.UK

8.5 Our Whistleblowing Policy enables those with concerns about any wrongdoing or breaches of law to raise these concerns without fear of disciplinary action.

9. Key performance indicators to measure effectiveness of steps being taken

9.1 In the academic year 2025-2026 the following KPI's were set and fully achieved:

9.1.1 Pre-employment checks will be completed for 100% of new staff prior to commencement of employment. This includes KCSE, DBS/Safeguarding and Right to Work in the UK checks.

9.1.2 The Financial Scheme of Delegation will be followed to ensure appropriate scrutiny of contractors and tender processes.

9.2 To ensure continuous improvement for 2026-2027, EAT commits to:

9.2.1 Review key policies and procedures: We will undertake a review of wording in relation to modern slavery and trafficking and strengthen wording where required.

9.2.2 Supplier Audits: We will review our highest risk suppliers as part of the ongoing procurement process and to mitigate risk.