WREKIN OLD HALL TRUST

Modern Slavery and Human Trafficking Policy & Statement

Academic / Financial Year:	2026–2027	**Policy Owner:**	Bursar
Date of Board Approval:	August 2026	**Safeguarding Lead:**	Designated Safeguarding Lead (DSL)
Next Scheduled Review:	August 2027	**Governance Oversight:**	Finance Committee & Board of Governors
Statutory & Regulatory Basis:	Modern Slavery Act 2015 (incl. s.54); Home Office Statutory Guidance (2025); Keeping Children Safe in Education (KCSIE) 2026; Independent School Standards Regulations (ISSR)		

1. Introduction & Purpose

Wrekin Old Hall Trust ("the Trust") is firmly committed to ensuring that modern slavery, servitude, forced or compulsory labour, and human trafficking are not present in any part of its operations, educational activities, or supply chains. We operate a zero-tolerance approach to all forms of exploitation and expect the same high ethical standards from everyone who works for, represents, or supplies the Trust.

This document sets out the Trust's operational policy and annual transparency statement under Section 54 of the Modern Slavery Act 2015. It aligns with Home Office statutory guidance (Transparency in Supply Chains: A Practical Guide, updated 2025), the Education (Independent School Standards) Regulations 2014 (ISSR), and the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (KCSIE, September 2026).

2. Scope & Related Trust Policies

This policy applies across the entire Trust community and supply network:

- **Personnel & Partners:** Applies to all employees, governors/trustees, volunteers, agency staff, contractors, consultants, and first-tier and sub-tier suppliers within the United Kingdom and overseas.
- **Operational Coverage:** Encompasses all aspects of Trust operations, including day and boarding education, co-curricular programmes, domestic and overseas educational visits, international pupil recruitment, fundraising, commercial lettings, historic properties, catering, and estates maintenance.
- **Policy Integration:** Operates alongside and reinforces the Trust's Safeguarding and Child Protection Policy, Whistleblowing (Confidential Reporting) Policy, Safer Recruitment Policy, Staff Code of Conduct, and Procurement & Financial Regulations Policy.

3. Safeguarding, Child Exploitation & Workforce Protections

Within an independent secondary school environment, modern slavery and human trafficking represent both a supply chain compliance obligation and a critical child protection responsibility. Under Keeping Children Safe in Education (KCSIE) 2026, staff must remain alert to the risks of child trafficking, child criminal exploitation (CCE, including county lines), and child sexual exploitation (CSE).

- **Child Protection Vigilance:** All staff and volunteers are trained to recognise behavioural, physical, and contextual indicators that a pupil may be at risk of or experiencing exploitation or trafficking, and to treat any concern as an immediate child protection matter.

- **Safer Recruitment & Employment Controls:** Under the Trust's Safer Recruitment Policy, rigorous pre-employment vetting is completed for all staff, volunteers, and regular on-site contractors, including statutory Right to Work verification, enhanced Disclosure and Barring Service (DBS) and barred list checks, compliance with UK National Living Wage / National Minimum Wage legislation, and written compliance assurances from recruitment agencies.

4. Supply Chain Risk Assessment & Priority Categories

The Trust maintains an active Modern Slavery Risk Register, reviewed bi-annually in light of sector intelligence, regulatory developments, and supplier audit outcomes. Particular due diligence is focused on higher-risk procurement and operational categories:

- **Estates, Facilities & Site Services:** Cleaning, catering, waste management, security, grounds maintenance, and building/refurbishment contractors.
- **Textiles & School Apparel:** School uniforms, sportswear, branded merchandise, and promotional goods manufactured in or sourced through high-risk jurisdictions.
- **IT, Electronics & Hardware:** Computing hardware, classroom audiovisual equipment, telecommunications, and electronic components with complex global mineral and assembly chains.
- **Employment Agencies & Third-Party Labour:** Supply teaching agencies, temporary catering or administrative staff, and outsourced labour providers.
- **International Suppliers, Trips & Recruitment Agents:** International suppliers, overseas school trip operators, residential tour providers, and overseas pupil recruitment agents.

5. Due Diligence & Supplier Management

The Trust conducts proportionate, risk-based due diligence prior to onboarding new suppliers and throughout ongoing contract management. For all suppliers with an annual Trust contract value or spend exceeding £50,000, as well as any supplier categorised as elevated-risk regardless of spend, the Trust will:

- **Annual Compliance Questionnaire:** Require completion of an annual Modern Slavery & Ethical Labour Due Diligence Questionnaire prior to contract award or renewal.
- **Statutory Declaration:** Obtain a formal written declaration confirming no convictions or pending prosecutions under Sections 1, 2, or 4 of the Modern Slavery Act 2015 (or equivalent overseas legislation).
- **Contractual Warranties & Audit Rights:** Incorporate mandatory anti-slavery, ethical labour, and audit clauses into standard Trust contracts and purchase terms.
- **Section 54 Verification:** Verify the publication and board approval of the supplier's annual Section 54 Modern Slavery Statement where the supplier meets the £36 million statutory turnover threshold.

6. Training, Awareness & Confidential Reporting

Effective prevention depends on informed staff and clear, trusted escalation channels across the Trust:

- **Induction & Annual Awareness:** All new staff, governors, and volunteers receive mandatory induction training covering modern slavery awareness, supply chain ethics, and KCSIE child exploitation indicators, reinforced via annual safeguarding updates.
- **Role-Specific Refresher Briefings:** Annual specialist refresher briefings are delivered to staff in key operational roles—including finance, procurement, budget holders, trip leaders, and estates/site managers—focusing on supplier red flags and contract vetting.

CONFIDENTIAL REPORTING ROUTES (2026–2027)

• Pupil / Child Safeguarding Concerns: Must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL in accordance with the Safeguarding and Child Protection Policy (or directly to Children's Social Care / Police on 999 if a child is in immediate danger).
• Staff, Contractor & Supply Chain Concerns: May be raised confidentially and without fear of detriment via the Trust's Whistleblowing Policy, directly to the Chief Financial Officer, or through the independent UK Modern Slavery & Exploitation Helpline on 08000 121 700.

7. Monitoring, Victim-Centred Remediation & Governance

- **Investigation & Victim-Centred Remediation:** All reported concerns or audit red flags are investigated promptly and thoroughly. In line with updated Home Office statutory guidance, where labour standards breaches are identified within a supplier's operations, the Trust adopts a victim-centred remediation approach. Rather than defaulting to immediate contract termination—which can inadvertently worsen harm to vulnerable workers—the Trust will prioritise requiring a time-bound Corrective Action Plan (CAP), independent verification, and worker remediation, reserving contract suspension or termination for severe breaches or persistent non-compliance.
- **Governance & Board Oversight:** The Finance Committee receives bi-annual updates on supply chain risk assessments, due diligence completion rates, and any reported concerns. The Board of Governors holds ultimate accountability and conducts a formal annual review and approval of this Policy & Statement each June.

8. Key Performance Indicators (KPIs) for 2026–2027

The Finance Committee monitors the effectiveness of this policy against the following measurable KPIs:

KPI Area	2025–26 Review / Baseline	2026–27 Measurable Target
Supplier Due Diligence Questionnaires	Baseline questionnaire framework reviewed; threshold refined to ≥£50k Trust spend.	100% of suppliers with ≥£50,000 annual Trust spend or elevated risk profile to return completed questionnaires by Q2.
Contractual Anti-Slavery Clauses	Standard anti-slavery clauses embedded in new procurement templates.	100% of new and renewed first-tier supplier contracts to include mandatory anti-slavery and audit clauses.
Staff & Specialist Training	Induction awareness and annual safeguarding briefings delivered across Trust.	100% of new starters trained within 30 days; 100% of procurement, finance, and estates staff complete annual refresher.
Incident & Concern Resolution	Zero confirmed incidents of modern slavery reported in 2025–26.	Zero unaddressed incidents; 100% of concerns logged, investigated, and escalated within 5 working days.

9. Continuous Improvement Action Plan (2026–2027)

Following completion of the 2025–26 evaluation of supplier questionnaires, contract clauses, and risk-prioritised categories, the Trust will undertake the following continuous improvement actions during the 2026–2027 academic and financial year:

- **1. Procurement Onboarding & Tier-2 Mapping:** Embed the revised £50,000 annual Trust-spend threshold into automated finance onboarding workflows and extend supply chain mapping to Tier-2 sub-contractors in catering, cleaning, and uniform supply.

- **2. Safeguarding & Procurement Alignment:** Conduct an annual joint governance review between the Chief Financial Officer and the Designated Safeguarding Lead (DSL) to ensure alignment between KCSIE 2026 child exploitation protocols, overseas educational visit vetting, and procurement controls.
- **3. Supplier Remediation Toolkit:** Deploy a standardised supplier Corrective Action Plan (CAP) template and ethical labour guidance note to support key contractors in strengthening Right to Work verification and worker welfare standards.
- **4. Statutory Horizon Monitoring:** Monitor UK Parliamentary reforms to Section 54 of the Modern Slavery Act 2015 so that the Trust's reporting framework remains prepared ahead of statutory commencement in 2027–2028.

This Policy & Statement was reviewed and approved by the Wrekin Old Hall Trust in August 2026