Special Partnership Trust

SPT MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Date Reviewed: July 2026

Date due for review: September 2027

Special Partnership Trust

Modern Slavery and Human Trafficking Statement

Financial Year 2025/26

1. About this statement

This Modern Slavery and Human Trafficking Statement is published by The Special Partnership Trust in accordance with Section 54 of the Modern Slavery Act 2015.

It sets out the steps taken during the financial year 1 September 2025 to 31 August 2026 to prevent modern slavery and human trafficking within our operations and supply chains, and our priorities for continuous improvement. We are committed to acting with integrity, transparency and care in everything we do. This includes ensuring that children, young people, staff, and those working within our supply chains are protected from exploitation, coercion and abuse.

2. What is modern slavery?

Modern slavery is the exploitation of individuals through coercion, deception, threats or abuse of vulnerability, where a person cannot refuse or leave their work or service.

In the context of a Multi-Academy Trust, risks may arise through:

Supply chains

Including forced labour, child labour, wage exploitation, debt bondage, or unsafe working conditions. Higher-risk categories may include cleaning, catering, construction, ICT hardware, uniforms, transport, and educational materials, particularly within complex or international supply chains.

Workforce exploitation

Including recruitment coercion, withheld wages, excessive working hours, unsafe conditions, or exploitation of agency and temporary workers.

Exploitation of vulnerable individuals
Including trafficking for labour or criminal exploitation, sexual exploitation, domestic servitude, or online grooming.

We recognise modern slavery as both a safeguarding and ethical issue.

3. Our organisation and supply chains
The Special Partnership Trust is a Multi-Academy Trust delivering specialist education for children and young people with special educational needs across England.

Our workforce includes teaching staff, support staff, therapists, leadership teams, estates personnel, and central services. We also engage agency staff, contractors, and external partners where required.

Supply chains
We procure a range of goods and services, including:

- facilities management and estates services
- catering and food supply
- cleaning and hygiene services
- ICT hardware, software, and digital services
- construction and capital projects
- educational resources and curriculum materials
- transport services
- agency and temporary staffing
- professional and consultancy services

We recognise that while many suppliers are UK-based, modern slavery risks may still exist through global supply chains. We therefore apply proportionate controls to identify and reduce risk.

4. Governance and accountability

The Board of Trustees has ultimate responsibility for ensuring compliance with the Modern Slavery Act 2015 and for overseeing ethical governance across the Trust.

Operational responsibility is delegated to the Executive Leadership Team, supported by procurement, safeguarding, and risk management functions.

Modern slavery risks are considered through:

- the Trust risk register
- procurement governance processes
- safeguarding oversight arrangements
- internal audit activity

The Board reviews this statement annually and monitors progress against identified priorities.

5. Policies and procedures

We do not operate a standalone modern slavery policy. Instead, prevention is embedded across our core governance framework, including:

- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Procurement and Tendering Policy
- Equal Opportunities Policy
- Health and Safety Policy
- Disciplinary and Grievance Procedures

Policies are reviewed and updated in response to legislative change, audit findings, and sector guidance.

Staff are informed of updates through formal briefings, training, and internal communications.

6. Due diligence and procurement controls

We apply proportionate due diligence to manage modern slavery risks in procurement and supplier relationships.

Our approach includes:

- procurement in line with the Academy Trust Handbook
- compliance with relevant procurement legislation and recognised frameworks
- mandatory supplier evaluation for relevant contracts
- use of approved public sector frameworks where appropriate
- requirement for suppliers to confirm compliance with the Modern Slavery Act 2015 (where applicable)
- inclusion of contractual clauses requiring ethical and lawful conduct
- monitoring supplier performance through contract management
- use of a centralised e-procurement system to strengthen transparency and oversight

Modern slavery compliance forms part of supplier selection and ongoing contract management for higher-risk categories.

Where concerns are identified, the Trust will engage with suppliers to seek remediation. Where necessary, we will escalate concerns or terminate contractual arrangements in line with legal and contractual rights.

7. Risk assessment and management

We maintain a structured approach to risk identification and management across the Trust.

Risk areas

We recognise increased inherent risk in:

- outsourced services (cleaning, catering, estates)
- construction and capital works
- ICT hardware and electronics supply chains
- uniforms, textiles, and educational materials
- transport and logistics
- agency and temporary labour markets

These risks arise due to labour intensity, outsourcing complexity, and international supply chains.

Risk management approach

- risks are recorded in the Trust risk register
- reviewed by senior leaders and Trustees
- informed by audit and procurement assurance activity
- embedded within operational and strategic decision-making

This ensures risks relating to modern slavery are actively monitored and mitigated.

8. Training and awareness

We are committed to ensuring all staff can recognise and respond appropriately to indicators of modern slavery.

Training is delivered through:

- mandatory safeguarding and induction training
- annual Trust-wide safeguarding updates
- accredited online training modules
- targeted training for procurement, HR, leadership, and safeguarding roles
- Designated Safeguarding Lead training and updates
- ongoing briefings and professional development

Training ensures staff understand:

- indicators of exploitation
- reporting routes
- safeguarding responsibilities
- escalation procedures

9. Effectiveness and impact

During the reporting period, we have strengthened our approach to preventing modern slavery through ongoing governance, procurement, training, and risk management.

Governance and policy

- annual review of all key safeguarding, procurement and recruitment policies completed
- strengthened alignment between procurement, safeguarding and risk frameworks
- clarified governance and oversight responsibilities

Procurement and due diligence

- increased use of approved procurement frameworks
- strengthened supplier assurance requirements within procurement processes
- improved contract documentation and central oversight through e-procurement systems
- enhanced procurement governance following internal audit findings

Training and safeguarding

- mandatory safeguarding training delivered across all staff groups
- modern slavery awareness embedded within safeguarding and induction processes
- consistent application of safeguarding procedures confirmed through assurance activity

Outcomes

At the time of reporting, no instances of modern slavery have been identified through safeguarding, whistleblowing, procurement monitoring, or internal audit activity.

10. Key performance indicators 2025/26

We will measure progress against the following indicators:

Supplier assurance

- 100% of relevant or higher risk new suppliers to provide appropriate modern slavery compliance assurance prior to award
- annual review of supplier records to ensure accuracy and currency
- full compliance with procurement legislation and threshold requirements

Recruitment and payroll assurance

- annual audit of recruitment and payroll processes

- implementation of agreed audit actions within required timescales

Training and awareness

- expanded targeted training for staff in higher-risk roles
- improved staff awareness and confidence in identifying risks of exploitation

Risk management

- strengthened integration of modern slavery risks within the corporate risk register
- improved consistency of risk escalation and reporting
- annual review of risk management framework and procedures

Governance and compliance

- annual review of procurement and ethical compliance documentation
- continuous improvement in contract management and supplier oversight

Approval

This statement was approved by the Board of Trustees of The Special Partnership Trust.