Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out the actions taken by Pathway Trust to understand all potential modern slavery risks related to its business and to ensure steps are put in place to prevent slavery and human trafficking, in accordance with the Modern Slavery Act 2015 and the governance requirements set out by the Department for Education (DfE) in the Academy Trust Handbook.

Pathway Trust, as part of the education sector, recognises its responsibility towards taking a robust approach to slavery and human trafficking. The trust is committed to preventing modern slavery and human trafficking in its activities and to ensuring supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

The trust operates 20 primary and secondary schools, providing education to children and young people across the age range 2-18.

Our supply chains primarily involve:

- Procurement of Goods and Services: Catering, cleaning, facilities management, ICT equipment, construction, and estate development.
- Staffing and Services: Supply agency staff, professional services, and consultancy.

We expect all contractors, suppliers, and business partners to adhere to high ethical standards and comply with all applicable legal requirements regarding anti-slavery and human trafficking.

Pathway Trust's educational and business activities are delivered wholly within the UK and the trust is predominately a service-based organisation. 80% of our expenditure is on staffing to deliver a high-quality education to our pupils. The trust procures goods and services from providers predominantly based within the UK.

Responsibility for the organisation's anti-slavery initiatives is as follows:

- *Policies*: The trust's Chief Executive Officer and Head of Governance are responsible for putting in place and reviewing policies. Trust and school leaders are responsible for the implementation of policies across all schools and trust partnership teams.

- *Investigations/due diligence*: Where a need for further due diligence or investigation is required in relation to known or suspected instances of slavery and human trafficking in relation to children and young people in the trust's schools, these will be undertaken by

Designated Safeguarding Leads (DSLs) in accordance and the latest Keeping Children in Safe in Education (KCISE) statutory guidance and the trust's Child Protection and Safeguarding Policy.

- *Training:* The Director of People is responsible for delivering training solutions across the trust, to ensure that training increases awareness and a better understanding of, and response to, identified slavery and human trafficking risks.

Relevant Policies

The trust operates the following policies that describe its overall approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- *Recruitment and Selection Policy*: The trust solely employs colleagues within the UK. Its recruitment practices are in accordance with the Keeping Children Safe in Education (KCSIE) guidance, and all employees and third-party supply staff are subject to screening and Disclosure and Barring Service (DBS) checks.

- *Whistleblowing Policy*: The trust encourages colleagues to disclose any activity which relates to danger, bribery, corruption, fraud or other unlawful unethical conduct in the workplace. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The policy is designed to make it easy for workers to make disclosures without fear of retaliation.

- *Code of Conduct*: The code makes clear to colleagues the actions and behaviour expected of them when representing the trust. Pathway Trust strives to maintain the highest standards of staff conduct and ethical behaviour.

- *Recruitment Agencies*: Pathway Trust uses only specified, reputable employment agencies to source labour.

Compliance, Financial Control & Due Diligence

The trust strictly adheres to the procurement, internal control, and financial governance standards set out in the Department for Education (DfE) Academy Trust Handbook. While the trust does not maintain a standalone procurement policy, it embeds anti-slavery due diligence into its supply chains through strict compliance with this guidance as follows:

- *DfE Framework Usage*: The trust prioritises the use of Department for Education approved procurement frameworks and contracts. These national frameworks automatically vet suppliers for compliance with labour standards and the Modern Slavery

Act 2015. This approach is used in high-risk sectors within trust operations, including cleaning and catering.

- *Probity and Value for Money*: In accordance with the Academy Trust Handbook, all purchasing decisions are conducted with high standards of financial probity, transparency, and value for money, ensuring robust checks on supplier credibility.
- *Risk Assessment and Management*: All tendering processes require prospective suppliers to provide explicit declarations regarding their supply chain ethics and employment practices.

Training and Awareness

To maintain awareness of modern slavery risks the following training is provided:

- Staff involved in purchasing receive guidance on applying DfE framework standards and identifying supply chain risks.
- Safeguarding training for all staff includes awareness of modern slavery, human trafficking, and child sexual exploitation as part of mandatory annual training requirements.

Board Approval

This statement has been approved by the Board of Trustees of the Pathway Trust on 22 October 2026 and is signed on its behalf by:

Signed:

Name: William Roberts

Role: Chief Executive Officer