



WICKERSLEY
PARTNERSHIP
TRUST.

Modern Slavery Statement

DATE: 2024-25

OWNED BY: Senior Marketing and Communications Manager

APPROVED BY: Audit and Risk Subcommittee

WICKERSLEY PARTNERSHIP TRUST

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Contents

1.	Introduction	3
2.	Organisational Structure and Scope	3
3.	Student Safeguarding	3
4.	Indicators of Modern Slavery	3
5.	Risk Management and Due Diligence	4
6.	Mitigation Strategies and Contractual Enforcement	4
7.	Training and Awareness	4
8.	Measuring Effectiveness (Key Performance Indicators)	5
9.	Links with Other Policies	5
10.	Board Approval	6
11.	Version Control	6



1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the actions taken by Wickersley Partnership Trust (WPT) to identify, prevent, and mitigate the risks of modern slavery and human trafficking within our business operations and wider supply chains for the financial year ending 31 August 2025.

WPT maintains a zero-tolerance approach to any form of modern slavery, forced labour, or human trafficking. We are fully committed to acting ethically, transparently, and with integrity in all our educational and business dealings, and to implementing robust systems to ensure exploitation is not taking place anywhere in our own organisation or across our external supply networks.

2. Organisational Structure and Scope

WPT is a Multi-Academy Trust and an exempt educational charity, with eight primary schools and five secondary schools located in Rotherham and Gainsborough.

WPT employs over 1,100 people, all of whom are subject to rigorous UK employment laws and safer recruitment screening processes. WPT has an annual turnover in excess of £36m, and so we are mandated by law to publish this annual statement to demonstrate our ongoing compliance and ethical governance.

Our main business operations are in the provision of education, though we are supported by a large number of suppliers of various sizes, the vast majority of which are entirely UK based. In line with our values, WPT is committed to ensuring there is no modern slavery or human trafficking within any part of our business or supply chain. We are proud to serve families from a variety of backgrounds, including those that have arrived from the EU or have arrived in the UK via resettlement or refugee schemes.

3. Student Safeguarding

As an educational institution, WPT recognises that modern slavery is fundamentally a child protection and safeguarding issue. Our commitment to anti-slavery practices extends beyond corporate supply chains to the direct protection of our students.

We acknowledge that young people face unique risks regarding forced criminality, "County Lines" drug exploitation, and child sexual exploitation (CSE). In strict alignment with the statutory guidance Keeping Children Safe in Education (KCSIE), our schools maintain rigorous monitoring systems to spot the signs of external coercion, trauma, or unexplained absences, and has dedicated safeguarding teams.

4. Indicators of Modern Slavery

In line with International Labour Office (ILO) standards, WPT trains staff to recognise indicators of exploitation, which include:

- Deceptive or Coercive Recruitment: Misleading information about work conditions or use of force/threats
- Abuse of Vulnerability: Exploiting a lack of education, language barriers, or migration status
- Exploitative Conditions: Excessive overtime, poor pay, or hazardous environments
- Coercion at Destination: Confiscation of identity documents or debt bondage

5. Risk Management and Due Diligence

The Trust has assessed the risk of modern slavery as low within its internal operations due to rigorous "Safer Recruitment" frameworks. We utilise mature procurement processes. A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium or appointed through means of a tender process. The Trust also makes extensive use of services provided by Local Authorities. However, we recognise increased susceptibility in specific supply chain areas.

Risk Categorisation

Risk Level	Identified Area of Concern	Strategic Oversight & Justification
High	None identified within current Trust operations.	No areas of current Trust operations are deemed high risk.
Medium	Supply of uniforms manufactured overseas. ICT hardware and electronics procurement.	These areas involve complex, multi-tiered supply chains, often relying on overseas manufacturing or low-wage, temporary labour. Even when well-managed locally, they represent standard potential oversight risks that require proactive monitoring.
Low	UK-based professional services; capital projects involving subcontractors. Direct employment of staff.	Highly regulated environments governed by strict UK employment frameworks and standard "Safer Recruitment" procedures.

6. Mitigation Strategies and Contractual Enforcement

To manage the risks identified in our supply chains, WPT implements the following defensive measures:

- **Tender Screening:** All formal procurement exercises incorporate mandatory screening questions to evaluate potential suppliers' compliance with the Modern Slavery Act 2015.
- **Supplier Due Diligence:** We demand written assurance and copies of up-to-date Modern Slavery Statements from all newly contracted "Tier 1" suppliers (specifically across Estates, ICT, and Catering) prior to contract finalisation.
- **Contractual Enforcement:** Compliance with the Modern Slavery Act is a mandatory, legally binding clause within our standard supplier Terms and Conditions. This explicitly grants WPT the legal right to terminate contracts immediately and without penalty if any anti-slavery breaches or exploitative practices are discovered within the supplier's operations.

7. Training and Awareness

WPT ensures that all staff understand the indicators of modern slavery and know how to report concerns:

- **All Trust Staff:** Receive mandatory annual awareness training via the "Essentials of Safeguarding" module, which highlights indicators of trafficking, forced labour, and child exploitation.
- **Specialised Personnel:** Trust Directors, HR leaders, and Procurement/Finance teams receive targeted annual refresher training focusing on evolving legislative updates, supply chain vulnerabilities, and ethical procurement risks.

8. Measuring Effectiveness (Key Performance Indicators)

To move beyond a "tick-box" compliance exercise and actively measure the impact of our anti-slavery efforts, the Trust evaluates its performance against the following outcome-focused KPIs:

- **Staff Training Compliance:** Target of 100% of all WPT staff completing the annual "Essentials of Safeguarding" training, with completion rates continuously monitored and reported directly to the Board.
- **Specialised Training Delivery:** Target of 100% of Directors, HR, and Procurement staff completing their annual refreshed training on legislative updates and procurement risks.
- **Supplier Vetting:** Target of 100% of newly contracted "Tier 1" suppliers (catering, estates, ICT) providing written assurance and copies of their Modern Slavery Statements before contract commencement.
- **Procurement Vetting:** Target of 100% of formal procurement and tender processes incorporating mandatory screening for Modern Slavery Act compliance.
- **Incident Investigation and Resolution:** Target of 100% of whistleblowing concerns or safeguarding reports relating to modern slavery being fully investigated within the strict timelines outlined in our wider policy framework.

Annual Incident Reporting Note

During the 2024-25 financial year, there were zero reported incidents or whistleblowing concerns regarding modern slavery or human trafficking within our internal operations or our external supply chains.

9. Links with Other Policies

The Trust enforces a suite of cross-departmental policies that collectively work to eliminate the risk of exploitation:

- Child Protection & Safeguarding Policy: Integrates the identification of student trafficking, criminal exploitation, and abuse into everyday school operations.
- Whistleblowing Policy: Provides a secure, confidential mechanism for individuals to raise suspicions of malpractice or exploitation. This policy is explicitly extended and available to all third-party contractors, agency workers, and suppliers, alongside directly employed staff.
- Safer Recruitment & Selection Policy: Ensures full compliance with UK right-to-work checks, identity verification, and Disclosure and Barring Service (DBS) monitoring.
- Staff Code of Conduct: Sets out clear expectations regarding professional, ethical, and lawful behaviour for all employees.
- Anti-Fraud (within the Financial Procedures Policy)
- Anti-Bribery Policy
- Grievance Policy
- Pay Policy
- Tender and Procurement Policy
- Equal Opportunities
- Harassment and Bullying Policy

10. Board Approval

This statement was approved by the **Wickersley Partnership Trust Board of Directors Audit and Risk Subcommittee** and is signed by the Chair in accordance with 2026 legislative updates.

Signed: 

Steve Calvert, Chair of Directors. Date: 1st July 2026

11. Version Control

Current Version: 2

Date	Revision (Details and Reason)	Author
2022-2025	Version 1 Reviewed annually	Senior Operations Manager
May 2026	Version 2 Formatting changes Addition of ILO standards and information on indicators of exploitation Addition of risk categorisation Addition of mitigation strategies Addition of KPIs	Senior Marketing & Communications Manager





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