

Modern Slavery and Human Trafficking Statement | Financial Year: 2024-25

Published in accordance with Section 54 of the Modern Slavery Act 2015

1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Aletheia Academies Trust ("the Trust") during the financial year ending 31st August 2025 to prevent modern slavery and human trafficking within our operations and supply chains.

Aletheia Academies Trust is a multi-academy trust serving communities across Kent. Our mission is rooted in Christian values and the belief in the dignity, worth and potential of every individual. We are committed to acting ethically and with integrity in all our business dealings and relationships.

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, bonded labour and human trafficking. The Trust has a zero-tolerance approach to modern slavery in all its forms.

2. Our structure and Operations

Aletheia Academies Trust is a charitable company limited by guarantee and an exempt charity regulated by the Department for Education. The Trust operates a number of primary and secondary academies and employs teaching and support staff across its schools and central team.

The Trust's annual turnover exceeds £36 million, and we are therefore required to publish this annual statement.

Our activities include:

- Delivery of education services to pupils aged 2-19
- Direct employment of staff
- Procurement of goods and services to support school operations

Our main supply chains relate to:

- Catering and food supply
- Cleaning and facilities management
- Construction and estates works
- IT hardware, software and digital services
- Agency staffing and recruitment services
- Uniform and educational resources

3. Policies and Governance framework

The Trust maintains a robust governance framework to ensure ethical practice and compliance with statutory duties.

Relevant policies include:

- Whistleblowing Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Recruitment and Selection Policy
- Scheme of Financial Delegation
- Financial Regulations
- Anti-Fraud and Corruption Policy
- Equality and Diversity Policy

Through these policies, the Trust promotes transparency, accountability and safe reporting mechanisms.

The Whistleblowing Policy enables staff and other stakeholders to raise concerns confidentially, including concerns relating to unethical practice within the Trust or its supply chains.

4. Due Diligence and Risk Assessment

The Trust recognises that the risk of modern slavery within the direct delivery of education services is low. However, we acknowledge that risk may arise in certain areas of our supply chains, particularly where:

- Labour-intensive services are provided (e.g. cleaning, catering, construction)
- Goods are sourced from international supply chains (e.g. IT equipment, uniforms)
- Agency or temporary staffing is used

To mitigate risk, the Trust:

- Conducts due diligence checks on new suppliers prior to engagement
- Uses established procurement frameworks where possible
- Requires suppliers to confirm compliance with the Modern Slavery Act where applicable
- Includes appropriate contractual clauses requiring compliance with relevant legislation
- Ensures financial controls and oversight via the Trust Board and Finance Committee
- Maintains oversight through internal scrutiny and external audit

The Trust's Audit & Risk Committee reviews risk management arrangements and provides assurance to the Board.

5. Recruitment and employment practices

The Trust is committed to fair and transparent recruitment practices.

We ensure that:

- All recruitment is conducted in accordance with Safer Recruitment principles
- Right to Work checks are completed for all employees
- Employment contracts are issued in compliance with employment law
- Pay is at least in line with statutory requirements and national frameworks
- Agency providers are required to demonstrate compliance with employment legislation

We do not use zero-hours contracts inappropriately and ensure that staff are not subject to unlawful deductions or coercive practices.

6. Training and awareness

The Trust ensures that safeguarding training is provided to all staff annually. While safeguarding training primarily focuses on child protection, it includes awareness of exploitation, trafficking and contextual safeguarding risks.

Senior leaders and those involved in procurement are expected to understand:

- The signs of modern slavery
- The Trust's zero-tolerance approach
- The appropriate reporting routes for concerns

Whistleblowing procedures are clearly communicated to all staff.

7. Monitoring and future actions

The Trust is committed to continuous improvement. During the next financial year, **we will:**

- Review supplier contracts to strengthen modern slavery compliance clauses where required
- Include explicit reference to modern slavery compliance in procurement documentation
- Review risk assessment processes relating to high-risk supply categories
- Ensure continued oversight via the Audit & Risk Committee

We will also continue to monitor developments in statutory guidance and best practice.

8. Board Approval

This statement has been approved by the Board of Trustees of Aletheia Academies Trust in accordance with Section 54(1) of the Modern Slavery Act 2015.

Signed: 

Chair of Trustees
Aletheia Academies Trust
Approved by Trustees on 25th March 2026

Website Publication

This statement will be published on the Trust's website with a prominent link on the homepage, in compliance with statutory requirements.