



# Modern Slavery Statement

For the financial year ending 31 August 2025

Approval date:	8 December 2025
Approved by:	Board of Trustees

Together we **Exceed**

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## 1. Introduction

- 1.1 Exceed Academies Trust (“the Trust”) is a charitable company limited by guarantee, headquartered in Bradford, West Yorkshire. Our purpose is to deliver exceptional education and improve life opportunities for the children, young people, and communities we serve.
- 1.2 We are committed to operating ethically, with integrity, and with full regard for the welfare of all individuals connected to our organisation. We recognise our responsibilities under the Modern Slavery Act 2015 and take a robust, preventative approach to modern slavery and human trafficking across all our operations and supply chains.
- 1.3 This statement sets out the steps we have taken during the financial year ending 31 August 2025 to identify, prevent, and address risks of modern slavery within our organisation and through our suppliers. It covers the whole of Exceed Academies Trust and its associated activities, including the SCITT and the Teaching School Hub.

## 2. Our Organisation

- 2.1 Exceed Academies Trust currently comprises 14 academies, including primary, secondary, special, and alternative provision settings, educating over 5,500 learners. We also operate:
  - the Exceed School-Centred Initial Teacher Training (SCITT) programme
  - the Exceed Teaching School Hub, including Appropriate Body services, for Bradford and our partners.
- 2.2 The Trust employs over 1,000 staff, and any employment with the Trust is subject to rigorous safer recruitment practices designed to ensure that all employees are legally entitled to work in the UK and protected from exploitation.
- 2.3 Modern slavery risks can arise in two areas relevant to our organisation:
  - **Safeguarding:** Some forms of exploitation, including child sexual exploitation, criminal exploitation, and trafficking, directly affect children and young people.
  - **Supply Chain:** Goods and services procured by the Trust may originate from sectors or regions where exploitation is a recognised risk.

## 3. Our Supply Chain

- 3.1 Our supply chains include (but are not limited to) suppliers of:
  - construction and capital works.
  - facilities management, cleaning, and catering.
  - ICT hardware, software, and managed services.
  - school uniforms and learning resources.
  - transport and agency staffing.
  - professional services.
- 3.2 Procurement is undertaken at both Trust and school level, with oversight and compliance support from our central Finance Team. All activity is governed by public procurement law, the Trust’s Financial Procedures, and the Scheme of Financial Delegation.

3.3 Wherever feasible, we establish Trust-wide arrangements with reputable UK suppliers. Many of these organisations publish their own modern slavery statements and have established compliance frameworks.

## 4. Policies Supporting Our Approach

4.1 A comprehensive suite of policies supports our commitment to preventing modern slavery and promoting ethical practice, including:

- Safeguarding and Child Protection Policies
- Recruitment Policy (including safer recruitment)
- Tendering and Procurement Policy
- Whistleblowing Policy
- Complaints Policy
- Financial Procedures and Scheme of Delegation
- Equality Statement, Policy and Objectives
- Gifts & Hospitality Policy
- Investment Policy

4.2 These policies are subject to regular review to ensure continued alignment with legislation, statutory guidance, and sector best practice.

## 5. Risk Assessment and Management

5.1 We regularly assess modern slavery risks within our operations and supply chains:

*High risk areas*

- No high-risk operational activities have been identified within the Trust.

*Medium risk areas*

- Outsourced cleaning, catering and facilities contracts.
- ICT equipment, EdTech and electronics (particularly those with overseas manufacturing).
- School uniforms and textiles.
- Labour sourced via third-party supply or recruitment agencies.

*Low risk areas*

- Education-focused agency staffing and UK-based professional services.

5.2 We recognise that risk levels vary by sector, geography, and market conditions. Our risk assessments are reviewed annually and informed by external guidance and sector intelligence

## 6. Due Diligence Processes

6.1 To mitigate risk and ensure ethical supply chain practices, the Trust undertakes proportionate and risk-based due diligence, including:

- requiring suppliers to confirm compliance with the Modern Slavery Act 2015.

- including modern slavery obligations in procurement specifications and contract terms.
- reviewing supplier modern slavery statements, policies, and compliance measures.
- obtaining assurances regarding suppliers' subcontractors and global supply chains.
- enhanced scrutiny of new suppliers in medium-risk categories.

6.2 Where concerns arise, we investigate promptly and take appropriate action, including suspension or termination of contracts if required

## 7. Training and Awareness

7.1 We are committed to equipping staff and governance representatives with the knowledge to recognise and report concerns.

- All staff complete annual safeguarding training, covering the risks and indicators of modern slavery, trafficking, and exploitation.
- Training for staff involved in procurement, finance, HR, and contract management includes responsibilities relating to supplier due diligence.
- Regular briefings are provided to senior leaders and governance boards.
- The Trust's Whistleblowing Policy enables confidential reporting of concerns.

## 8. Measuring Effectiveness and Continuous Improvement

8.1 To evaluate the effectiveness of our actions and drive continuous improvement, we:

- review and update relevant policies annually.
- monitor contract compliance and procurement activity.
- investigate and respond to any reported concerns.
- track developments in legislation and public-sector best practice.
- strengthen onboarding processes for new suppliers.
- increase staff and trustee/governor awareness through updated resources and training.

8.2 For 2025/26, our areas of focus will include enhancing supplier questionnaire processes, providing targeted training for procurement leads, and strengthening documentation of contract monitoring.

## 9. Accountability and Governance

9.1 The Board of Trustees holds overall responsibility for ensuring compliance with the Modern Slavery Act 2015 and for approving this statement.

- Headteachers and Local Advisory Boards are responsible for ensuring compliance with this statement within their schools.
- Central Trust teams manage compliance relating to cross-Trust contracts and suppliers.
- All employees are responsible for reporting any concerns about potential modern slavery or unethical practices, whether internal or external.

9.2 This statement has been approved by the Board of Trustees and will be reviewed annually.