



MODERN SLAVERY STATEMENT

THIS STATEMENT IS MADE PURSUANT TO SECTION 54(1) OF THE MODERN SLAVERY ACT 2015 AND CONSTITUTES OUR SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2024- 2025

Policy Reviewed	Audit and Risk Committee on 26.03.2026
Policy Approved by Trust Board	29.04.2026
Next review date	Spring 2027 (needs to be done within 6 months of financial year end)

Table of Contents

1. Introduction	1
2. Human Resources	1
3. Supply Chains	1
4. Assessment of Modern Day Slavery in our Supply Chains	1
5. Due Diligence Process.....	3
6. Training	3
7. The Effectiveness of our approach to Combatting Modern Day Slavery	3
8. Plan for 2026.....	3

1. Introduction

The Cranmer Education Trust (CET) recognise that Modern Slavery is a growing global issue and is committed to eradicating the risk of modern slavery in our employment processes and our supply chains and operations.

We are a multi-academy trust company operating state funded schools. Our funding comes primarily from agreements with the Secretary of State for education and other grant funding from central and local government.

Our governance follows the model academy trust structure, with Members, a Board of Directors and an Executive team working to ensure the charitable objects of the company are achieved through the powers provided under our articles of association and within the regulatory framework set by the Department for Education.

We have an annual turnover of £45,995,000 in our financial year Sep 24 – Aug 25.

2. Human Resources

The Cranmer Education Trust employs all employees on the national terms and conditions for school teachers' (STPCD and Burgundy Book) and support staff (Green Book).

The CET has a trade union recognition and collective agreement, which establishes machinery to consult and negotiate with staff through the recognised trade unions.

The CET has comprehensive policies, and processes for employing staff with a system of rigorous employment checks. Recruitment processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. CET consider the risk of slavery, including forced labour to be low in the directly employed workforce.

The CET is committed to providing a safe working environment for all and has a range of policies and procedures in place covering building safety, staff safety and contractors. CET has specific reporting tools in place to enable people to report an accident or incident should the need arise, and it adheres to current health and safety legislation.

CET does not employ anyone under the age of 16. Occasional placements (usually during summer holidays) for pupils over 16 from our schools may be accepted.

Living wages are paid – CET's lowest paid salary range is above the living wage.

3. Supply Chains

CET have around 1200 direct suppliers across the UK. These are predominantly local suppliers of education equipment and services. CET also buy from major national suppliers in areas such as utilities, catering, and cleaning. CET's invitation to tender for major contracts includes a selection criterion requiring adherence to the Modern Slavery Act as mandatory minimum standard - pass/fail.

4. Assessment of Modern Day Slavery in our Supply Chains

CET will ensure that efforts towards combatting modern slavery are targeted towards the highest risk areas. We intend to base this risk assessment not only on our own understanding of our supply chains, but also on publicly available research and information which identifies particular industries and countries

which pose the biggest risk of human trafficking and modern slavery. We intend to review our risk assessment (and update it if necessary) once every 2 years.

We currently anticipate that our areas of highest risk are:

Modern Slavery Risk Assessment		
Identified risk	Assessment of risk	How is our business affected?
<p>The highest risk suppliers for us are:</p> <p>Amazon</p>	<p>Unpredictability, Amazon's convenience creates blind spots and lack of supply chain transparency.</p>	<p>We have seen increasing use of Amazon which is a risk to staff bypassing purchasing routes. Need to re-set parameters for purchasing generally and become more robust about using appropriate procurement routes in an effective and timely regime for cost efficiency and use of time.</p>
<p>General structural risks in school procurement.</p>	<p>Already have systems for proactive due diligence and supplier engagement but capacity for overseeing procurement through frameworks and ongoing contract management are risks.</p>	<p>DFE renewed commitment through Maximising Value for Pupils Programme (Sept 25) goes further than its predecessor (School Resource Management) and looks systemically at collective buying power. This should in principle strengthen commercial discipline and transparency and reduce exposure to unvetted suppliers.</p>
<p>Outsourced facilities contracts e.g. catering, cleaning, lettings.</p>	<p>Regularly feature in case studies of exploitation due to low paid, outsourced labour and subcontracting layers.</p>	<p>We need to continue to follow public procurement guidance and have a high level of due diligence and ongoing robust contract management for FM contracts.</p>
<p>ICT equipment</p>	<p>Globally high risk because of raw material extraction and manufacturing</p>	<p>We need to follow public procurement guidance and follow DFE new programme.</p>

Suppliers of Utilities	<p>conditions. Risk of forced labour in supply chains.</p> <p>Oil extraction is the main source of the energy sector. Several globally significant suppliers of oil have poor human rights records which leads to an increased risk of exploitation.</p>	<p>As above, the collective buying power initiative will include energy.</p>
Suppliers of Uniform	<p>Manufacturing is often outsourced to countries with lower labour costs which increases the risk of use of slavery. Monopoly uniform providers may have limited transparency and supply chains involving low cost overseas manufacturing</p>	<p>New government Bill introduces a statutory limit of 3 branded items as part of broader policy to reduce financial barriers for families. Effect on suppliers may be more transparent global supply chains, high street and supermarket suppliers generally operate under stronger corporate governance and scrutiny including modern slavery reporting duties.</p>

5. Due Diligence Process

We have in place systems and procedures designed to:

- Perform due diligence on our existing and potential suppliers.
- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

7. The Effectiveness of our approach to Combatting Modern Day Slavery

We measure the effectiveness of our approach to combatting modern slavery in the following ways:

- Home Office Modern Slavery training completed by central executive HR and finance employees.
- Raise awareness through sharing Modern Slavery Statement with Trust Board and JCNC
- Review procurement policies.
- Follow DFE Maximising Value for Pupils guidance (2025) to map suppliers and lean on the strength in the wider school collective buying power protection.

8. Plan for 2026

During 2026 we plan to take the following key steps to further strengthen our approach to combatting the risk of modern slavery and trafficking in our supply chains:

- Follow DFE Maximising Value for Pupils Programme (2025)
- Review contracts register and key suppliers for areas of risk
- Use the business manager forum and finance training sessions to raise internal awareness.
- Review procurement process and principles at school level, timing of purchases, use of frameworks and last minute orders including Amazon.