

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Bradford Diocesan Academies Trust (BDAT) is committed to ensuring that modern slavery and human trafficking have no place in our organisation or supply chains. We recognise that exploitation can occur in any sector, including education, and we take seriously our responsibility to act with integrity, transparency, and vigilance. We are committed to the highest standards of ethical conduct in all our activities and making continuous improvement in this area.

This statement is designed to satisfy the requirements of Part 6, Section 54 of the Modern Slavery Act (2015) and outlines the steps BDAT has taken during the financial year to prevent modern slavery and human trafficking within our organisation and supply chains.

About BDAT- Organisation Structure and Supply Chains

BDAT is a multi-academy trust operating across Bradford. We oversee a diverse family of 16 primary and 5 secondary academies, employing teaching, support, and central staff.

The Trust works primarily with UK based suppliers and contractors and our employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our commitment to treating employees ethically and with integrity.

Our supply chains include:

- Facilities and estates: cleaning, catering, grounds maintenance, security, waste management
- Construction and capital works: contractors, subcontractors, and specialist trades
- ICT and digital infrastructure: hardware, software, licensing, and support services
- Educational resources: textbooks, stationery, curriculum materials, digital learning tools
- Uniform and clothing suppliers
- Recruitment and staffing agencies
- Professional services: HR, legal

Policies and Governance

BDAT meets governance requirements by maintaining and regularly reviewing a comprehensive framework of policies designed to prevent modern slavery:

Key policies include:

- Modern Slavery and Human Trafficking Statement:
- Safeguarding and Child Protection Policy:
- Whistleblowing Policy:
- Procurement Policy:
- Recruitment and Selection policy
- Code of Conduct for Staff and Suppliers
- Equality Statement and Objectives
- Gifts and Hospitality

These policies are reviewed regularly to ensure they remain effective and aligned with best practice.

Due Diligence Processes

BDAT undertakes due diligence to identify, prevent, and address modern slavery risks:

- Supplier vetting: We require suppliers to confirm compliance with the Modern Slavery Act and provide evidence where appropriate.
- Contractual safeguards: All new contracts include clauses requiring ethical labour practices and allowing BDAT to terminate relationships where breaches occur.
- Framework procurement: We prioritise purchasing through reputable frameworks that conduct their own ethical audits.
- Recruitment checks: We ensure all staff and agency workers undergo right-to-work verification and safeguarding checks.
- Monitoring and review: We periodically review supplier performance and escalate concerns where necessary.
- Whistleblowing oversight: Concerns raised through whistleblowing channels are investigated promptly and sensitively.

Risk Assessment and Management

BDAT conducts ongoing assessments to identify areas where modern slavery risks may be higher. These include:

High-risk categories

- Cleaning and catering services
- Construction and maintenance
- Uniform and ICT supply chains
- Agency staffing and temporary labour

Risk mitigation actions

- Reviewing supplier modern slavery statements annually
- Requesting additional evidence from suppliers in higher-risk sectors
- Conducting spot checks and contract reviews
- Ensuring procurement staff are trained to identify red flags
- Engaging with suppliers to improve transparency and ethical compliance
- Using suppliers who are pre approved by a purchasing consortium such as Crown Commercial Services (CCS) or appointed through means of a formal tender process.

Actions Taken This Year

During the reporting period, BDAT has strengthened its approach through the following actions:

- Updated our Modern Slavery Policy
- Enhanced procurement processes with mandatory ethical compliance checks
- Reviewed high-risk suppliers
- Audited right-to-work procedures across all academies
- Strengthened contract management with modern slavery clauses
- Raised awareness through internal communications and safeguarding briefings

Training and Capacity Building



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- BDAT recognises that awareness and vigilance are essential to preventing modern slavery. We provide:
- Mandatory safeguarding training for all staff
- Induction training for new staff on ethical conduct and reporting
- Specialist training for procurement
- Guidance for school leaders on identifying exploitation
- Access to external resources and government guidance
- We aim to build a culture where staff feel confident to identify and report concerns.

Future Commitments

BDAT is committed to continuous improvement. Over the next year, we will:

- Expand supplier audits and evidence requirements
- Strengthen our ethical procurement strategy
- Develop a more systematic approach to supply chain mapping
- Enhance reporting mechanisms and escalation processes
- Continue embedding our values — Inclusion, Compassion, Aspiration, Resilience, Excellence — into all aspects of governance and procurement