

Modern Slavery Act statement

This policy is prescribed by The Good Shepherd Trust and all reference to 'the Trust' includes all Trust schools, the central team and subsidiary organisations.

Date adopted:	March 2020	Last reviewed:	January 2026
Review cycle:	Annually	Is this policy statutory?	Yes
Approval:	Trust Board	Author:	Head of HR
Next Review Date:	January 2027		

Revision record

Minor revisions should be recorded here when the policy is amended in light of changes to legislation or to correct errors. Significant changes or at the point of review should be recorded below and approved at the level indicated above.

Revision No.	Date	Revised by	Approved date	Comments
1	22/03/2023	D Bird	June 23	Existing policy reviewed and template updated
2	23/07/2024	F Mackrory		Moved review cycle to every 3 years and approval to CEO
3	30/07/2024	P Kennedy		Added information in the introduction and organisation and supply chain
4	18/09/2025	D Bird		Review cycle changed to annual. Added sections on risk assessment and mitigation and monitoring and review.
5	25/01/2026	F Mackrory		Various changes to Name and Header to reflect guidance

1. Introduction

The Good Shepherd Trust (GST) is a multi-academy trust serving schools across Surrey and Hampshire. Our trust comprises both primary and secondary schools, schools affiliated with the Church of England, and others that are not. Our purpose is to grow and maintain a strong network of schools within a highly supportive and dynamic network. Our school communities thrive when they collaborate, with common values and goals and the shared vision "to be better, together".

The children and young people within our schools are at the heart of what we do. We also seek to fulfil the Church of England's vision for education providing schools for the entire community we serve, for people of all faiths and none. GST schools are highly inclusive settings where we strive to see each child flourish and grow, transforming lives and offering breadth and richness in each school's curriculum connected through our trust's curriculum charter. We aim for an ambitious education for every child in every school every day.

This statement sets out the trust's actions to understand all potential modern slavery risks related to its operations and to put in place steps that are aimed at ensuring that there is no direct or indirect slavery or human trafficking within the trust or its supply chains. As part of the education sector, the trust recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

This statement applies to all persons working for and/or on behalf of the trust in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

2. Statement of intent

As a trust, we are committed to raising awareness of modern slavery and human trafficking within our organisation, as part of our responsibility for the safeguarding of pupils.

The Trust has a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We expect our external suppliers and contractors to abide by this statement and will carry out appropriate due diligence within our procurement process to evaluate the modern slavery and human trafficking risks of each new supplier to ensure that The Trust will not knowingly enter a business relationship with a non-compliant organisation.

3. Organisational structure and Supply chains

This statement covers the activities of the GST:

- We were established in 2013 with a vision to create a flourishing multi-academy trust within the Diocese of Guildford and have since grown into a family of academies.
- We currently serve young people across Surrey and Hampshire.
- Our academies provide either infant, junior, primary or secondary education.
- Our strong ethos is integral to our educational provision, and we are a family of schools that share common values.
- We employ over 950 staff and all our operations are based in the UK.

4. Risk Assessment and Mitigation

The Trust will undertake risk assessments to identify areas of potential vulnerability to modern slavery and human trafficking. This includes reviewing supply chains, procurement practices, and employment procedures. Where risks are identified, appropriate mitigation strategies are implemented, including supplier audits, enhanced due diligence, and staff training.

5. Accountability

The Board of Trustees has overall responsibility for ensuring that this statement complies with our legal and ethical obligations, and that all those under its scope are aware of and compliant with it. Within our academies, the Headteacher and the Local Committees are responsible for ensuring compliance with this statement in relation to any parties working with or on behalf of that academy. Individually, employees are responsible for notifying their line manager should they become aware of any activities, within the Trust or by any of its external suppliers or partners that is not compliant with the Statement of Intent above.

6. Policies

To support our statement of intent, the following policies are in place to promote good practice across the Trust, and to provide clear and consistent mechanisms for handling any issues of concern. They are subject to regular review in order to remain fit for purpose:

- Single Equalities Policy and Objectives
- Gifts and hospitality
- Safeguarding and Child Protection Policies
- Finance Policy - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct may lead to the termination of the business relationship.
- Whistleblowing and Complaints Policies - The organisation encourages all its workers, stakeholders and other partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing and complaints procedures are designed to make it easy for individuals or organisations to make disclosures, without fear of retaliation.
- Code of Conduct – This further supports the Trust's commitment to ensuring that employees understand the actions and behaviour expected of them when representing the organisation. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour within Academies, the Trust central team and when and managing its supply chain.

7. Demonstrate compliance with the minimum legal requirements

<https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

To meet and demonstrate we have met the minimum legal requirements we will:

- Update this statement annually, as per UK government guidance for organisations with a turnover of £36 million or more.
- Publish our modern slavery statement on our website

The Good Shepherd Trust is committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment. We will ensure that all our recruitment and selection practices reflect this commitment. All successful candidates will be subject to Disclosure and Barring Service checks along with other relevant pre-employment checks, including a Section 128 Check.

8. Monitoring and Review

The Trust monitors the effectiveness of its modern slavery statement through regular policy reviews, supplier audits, and feedback from staff and stakeholders. Any identified gaps or areas for improvement are addressed promptly.

Chair of GST Board
Yvonne McLeod

CEO of GST
Paul Kennedy