

Introduction

Anthem Schools Trust is committed to the principles of the Modern Slavery Act 2015 and to preventing modern slavery and human trafficking in all aspects of its operations and supply chains. We continue to review and improve our practices in line with our values of **integrity**, **collaboration**, and **excellence**.

Anthem is a charity and company limited by guarantee that operates state-funded schools in England. We are funded and regulated primarily by the Department for Education.

Organisation Structure and Supply Chain

The Trust operates 15 state-funded schools across both primary and secondary phases. We also provide training for people working in and with schools, including trainee teachers. The Trust is led by a Chief Executive and Executive Team, and each school is led by a Headteacher and senior leadership team.

We employ approximately 1,100 people. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and are safeguarded from any abuse or coercion once in employment.

Procurement occurs at school level with oversight from a central support function, including procurement professionals. Our supply chain is extensive and consists primarily of UK-based suppliers.

Policies in Relation to Modern Slavery

Anthem maintains a number of policies that reflect our commitment to acting ethically and with integrity in all our relationships. These include:

- Staff Code of Conduct
- Whistleblowing Policy
- Dignity at Work (anti-bullying and anti-harassment) Policy
- Whole-School Equality Policy

All policies are reviewed on a rolling basis and updated as needed.

Due Diligence

We follow due diligence processes when procuring goods and services, in line with the Public Contract Regulations 2015. These include ensuring compliance with relevant legislation and assessing suppliers for any risk of modern slavery or human trafficking.

Where we identify medium-risk suppliers, such as those in the catering, cleaning, ICT, or uniform sectors, we ensure appropriate clauses are included in contracts and request confirmation of their own compliance with the Modern Slavery Act.

The Executive Team and Headteachers are responsible for investigating any suspected instances of modern slavery or human trafficking.

Risk Assessment and Management

We assess the risk of modern slavery across our activities and supply chains as follows:

High risk activities

- None identified within our operations or Tier 1 suppliers.

Medium risk activities

- External contractors for catering and cleaning services
- Suppliers of school uniforms and ICT equipment where manufacturing occurs overseas

Low risk activities

- UK-based recruitment agencies supplying temporary teaching and support staff

All tenders for goods and services require suppliers to comply with the Modern Slavery Act 2015.

Safeguarding

Anthem is committed to promoting the welfare of students and young people. We have policies and procedures in place to support safeguarding, including training and reporting systems.

Our Head of Safeguarding works with Designated Safeguarding Leads in every school and liaises with Local Authorities and other agencies to manage issues such as:

- Children at risk of trafficking or exploitation
- Missing children or those at risk of going missing

Annual safeguarding training is mandatory for all employees and includes a module on modern slavery and human trafficking.

Monitoring and Key Performance Indicators

To assess the effectiveness of our approach, we:

- Track completion of modern slavery training for all relevant staff
- Ensure annual safeguarding training for all employees includes modern slavery content
- Require all procurement tenders to include compliance requirements with the Modern Slavery Act

In 2025–26, we will review whether to expand contract manager training to strengthen monitoring of outsourced services.

Training on Modern Slavery and Trafficking

All staff have access to a certificated training module on Understanding Modern Slavery through our online training provider's training portal. This training is mandatory for those involved in recruitment or procurement.

Annual safeguarding training delivered at school level also includes modern slavery awareness. Additional training will be considered for individuals responsible for managing contracts involving higher-risk suppliers.

Reporting Concerns

Any concerns or suspected breaches relating to modern slavery may be raised through our Whistleblowing Policy or reported to a member of the Executive Team.

Financial Year End: 31 August 2025

This statement was approved by the Board of Trustees in November 2025