



The Bay Learning Trust Modern Slavery and Human Trafficking Statement

Introduction

This statement relates to actions and activities during the financial year 1st of September 2025 to 31 August 2026 and is made on behalf of The Bay Learning Trust (company number 07588464) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

The Bay Learning Trust is a growing multi academy trust based in the North West of England. As part of the education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to ensuring that its activities and supply chains are free from slavery and human trafficking.

Organisational structure and Supply chains

This statement covers the activities of The Bay Learning Trust:

- We were established in 2017 with a vision to ensure that 'Excellence, Integrity and Service' is at the heart of all we do.
- We have since grown into a family of 6 Academies
- We currently serve over 5,000 children and young people
- We are determined to ensure that all pupils thrive and achieve providing an inclusive education
- Our academies are based in the North West England, providing nursery, primary, secondary and post -16 education.
- We employ over 700 and all of our operations are based in the UK.

Risk Management

As part of our initiative to identify and mitigate risk we have identified the principal areas which carry material risks. The Bay Learning Trust ensures that suppliers are required to demonstrate their methods of corporate social responsibility during the tendering and selection process, details of which may vary according to the project. Suppliers are required to fully comply with the Modern Slavery Act 2015 and are confirming that they do so by accepting the Trust's terms and conditions. The Bay Learning Trust reserves the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015. Policies and procedures are in place to mitigate the risk of slavery and human trafficking occurring in our supply chains and to protect whistle blowers.

Procurement and Supply chain management

A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium such as Crescent Purchasing Consortium (CPC) or appointed through means of a formal tender process. Our supply chains include:

- education equipment, textbooks and resources suppliers
- student and staff uniform suppliers
- estate management maintenance and services
- ICT equipment and services
- catering services and supplies
- cleaning services and supplies
- peripatetic music services
- supply/agency staff
- trainee teachers

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the construction industry. We will be taking the following steps to promote awareness of this during 2025/26:

- Include compliance with the Modern Slavery Act and Living Wage Accreditation as a condition or criterion in specification and tender documents wherever possible
- Ensure our supplier on-boarding process includes due diligence around adherence to the Modern Slavery Act 2015
- Ensure suppliers have access to our standard Terms & Conditions which require compliance to the Modern Slavery Act
- Look for supplier aggregation opportunities in high-risk areas, such as cleaning, to better manage the risks associated with Modern Slavery
- Work closely with key partners to better understand how they are managing risks associated with Modern Slavery
- Consult with our recognised Trade Unions

Our policies to resist modern slavery and human trafficking

The Bay Learning Trust is confident that our policies promote good behaviour among our colleagues. Our policies and procedures are kept under review to make sure that they reflect the changing needs of The Bay Learning Trust and of the staff, students/pupils and the communities it serves.

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act are:

- Code of Conduct
- Equality & Diversity Policy

- Gifts, Hospitality & Related Party Policy
- Financial Framework
- Safer Recruitment Policy
- Single Central Record
- Child Protection and Safeguarding Policy
- Whistleblowing Policy

Safeguarding

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Trust Safeguarding Lead as well as Designated Safeguarding Leads and Deputy Leads in every academy. Collectively, these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. Each academy proactively works with the local authorities, the local safeguarding partnerships, the LADO and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Good practice is shared amongst the academies, with governors and directors. The focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation is an agenda item at every full board of directors and full local governing body meetings.

Our Child Protection and Safeguarding Policy is reviewed annually by the Executive Leadership Team and the Board of Directors. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE 2025).

Training and continuing vigilance

This Statement is reviewed on an annual basis by the Trust Board of Directors. The Executive Leadership Team to be trained. We provide guidance to our finance team and those involved in procurement of the need to avoid those risks and on possible indicators of them during the procurement of goods and services. We will continue to enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

Declaration

This statement has been approved by The Bay Learning Trust Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Chief Executive Officer (CEO)

Print	Sign	Date

Chair of The Bay Learning Trust Board of Directors

Print	Sign	Date