

Spark Education Trust Modern Slavery Statement 2025–2026

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and covers the period 1 September 2025 to 31 August 2026. Spark Education Trust is committed to preventing modern slavery and human trafficking within its operations and supply chains. We take a risk-based approach to identifying, managing and reducing modern slavery risks.

Structure, Business and Supply Chains

Spark Education Trust is a multi-academy trust operating schools across England through its central Trust functions and individual schools. A full list of schools is available on the Trust's website. Our supply chain is predominantly UK-based and includes catering, cleaning, agency staffing, maintenance, repairs and other support services. We recognise that modern slavery risks can arise within domestic supply chains, particularly in outsourced and labour-intensive services.

Our Approach

We act ethically and with integrity in our operations and expect those we work with to comply with applicable laws and regulations and uphold appropriate standards. Our approach is supported by relevant Trust policies and procedures, including safeguarding, whistleblowing, complaints, safer recruitment, staff conduct and supplier requirements. The Audit and Finance Committee provides appropriate oversight of the Trust's arrangements for managing modern slavery risks within our operations and supply chain.

Identifying and Managing Risks

The Trust takes a risk-based approach to identifying and managing modern slavery risks. We consider factors including the nature of services, workforce characteristics, supply chain arrangements and safeguarding vulnerabilities. Our key areas of focus are safeguarding risks, including exploitation and trafficking, and supply chain risks, particularly where services involve contractors, agency workers or other outsourced labour.

Safeguarding

Spark Education Trust is committed to safeguarding pupils and staff and maintaining a strong culture of safeguarding across the Trust. We have a Director of Education who oversees Trust safeguarding and a Designated Safeguarding Lead in each school. Our safeguarding arrangements include identifying and managing risks relating to exploitation and human trafficking. Staff, within safeguarding training receive appropriate training to recognise indicators of exploitation and understand how to raise concerns. Schools work with relevant local authorities and safeguarding partners where concerns arise. Our Child Protection and Safeguarding Policy is reviewed annually and approved by the Board of Trustees in line with statutory requirements and Keeping Children Safe in Education. Safeguarding practice is monitored at Trust and school level.

Procurement and Supplier Due Diligence

We expect suppliers to comply with applicable laws and regulations and meet the Trust's relevant safeguarding and employment requirements. Where requirements are not met, we may take appropriate action, including ceasing to trade with a supplier. Modern slavery risks are considered within our procurement and supplier management processes, through our use of appropriate public sector

procurement frameworks for procuring goods and services. Supplier due diligence is undertaken on a risk-based basis, taking account of the nature of the service and relevant supply chain risks.

Key Performance Indicators

We monitor the effectiveness of our approach through:

- staff completion of relevant safeguarding and modern slavery training.
- procurement and supplier compliance.
- safeguarding and whistleblowing concerns relating to exploitation.
- actions taken to address identified risks and improve our approach.

Training and Raising Concerns

Staff receive appropriate training and guidance on safeguarding, modern slavery and exploitation, including recognising potential indicators and raising safeguarding concerns. Our Whistleblowing Policy provides a confidential route for staff and others to report wrongdoing or breaches of law. We review our training and reporting arrangements to ensure staff understand their responsibilities and concerns can be raised and addressed appropriately.

Reporting

No modern slavery referrals were made to the Trust during the reporting period.

Continuous Improvement and Priorities for 2026-2027

During 2026-2027, the Trust will continue to strengthen its approach by:

- developing supplier due diligence.
- enhancing procurement guidance and staff awareness.
- reviewing our KPIs and monitoring arrangements.

These actions support our commitment to continuous improvement in preventing modern slavery and human trafficking.

Responsible Body: Trust Board

Date: October 2026 (Board review and approval at meeting on 22.10.26)

Signed: Charlotte Irving

Position: Chair of Trustees