



**ATHENA**  
LEARNING TRUST

# Athena Learning Trust Modern Slavery and Human Trafficking Statement

## **Review**

Reviewed on: October 2025

Reviewed by: Board

Review Period: 3 years

Version: 2.0



## **Introduction**

This policy statement is made by the Board of Trustees of the Athena Learning Trust pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act').

This Statement applies to the Athena Learning Trust as a whole and to all the schools and service units in the Trust, to their Trustees, governors, staff and volunteers, and to external contractors, consultants and suppliers. Where this statement refers to a Principal, this should be read as the CEO when relating to the Shared Service.

Athena Learning Trust is committed to preventing slavery and human trafficking in all corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## **Organisational structure and supply chains**

Athena Learning Trust is an academy trust, a charitable company with the sole purpose of advancing education by maintaining and developing academy schools, to provide comprehensive and inclusive education for the public benefit, funded by the Department for Education.

Athena Learning Trust is responsible for primary and secondary schools in Cornwall and Devon; it employs approximately staff and has an annual turnover in excess of £18m.

Athena Learning Trust recognises its responsibility to tackling modern slavery throughout its supply chains. The Trust's supply chains include the procurement of: uniform; catering, cleaning, caretaking and grounds maintenance services; furniture and equipment; ICT hardware; and construction.

## **Responsibilities**

The Board of Trustees has overall responsibility for ensuring this statement complies with the Trust's legal and ethical obligations, and that all those under its control comply with it.

The Principal at each school within Athena Learning Trust has primary and day-to-day operational responsibility for ensuring that this policy statement is complied with in respect to their school.

The Athena Learning Trust Finance Director has responsibility for implementing the policy and for monitoring and auditing internal control systems to ensure this statement is adhered to.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training regarding modern slavery in supply chains.

Trustees, governors and staff involved in procurement are responsible for ensuring that this policy is complied with in the Trust's supply chains.

## **Associated policies**

The following policies and procedures are directly related to and complement this Policy:

- Athena Learning Trust Whistleblowing Policy.
- Athena Learning Trust Safeguarding Policy.
- Athena Learning Trust Finance & Procurement Policies.
- Athena Learning Trust Staff Code of Conduct.

## **Compliance with the policy statement**

The Board of Trustees is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015, and to taking steps to understand

potential modern slavery risks within its business, and to ensure that there is no slavery or human trafficking taking place in its business and its supply chains.

All Trustees and governors, members of staff and volunteers, external contractors, consultants and suppliers of the Athena Learning Trust must read, understand and comply with this statement. They must:

- i. Avoid any activity that might lead to, or suggest, a breach of this statement.
- ii. Notify their Principal as soon as possible if they believe or suspect that a conflict with this statement has occurred or may occur in the future.
- iii. Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- iv. If they believe or suspect a breach of this statement has occurred or may occur, notify their Principal or report it in accordance with the Athena Learning Trust Whistleblowing Policy as soon as possible;
- v. If the Principal believes or suspect a breach of this statement has occurred or may occur they must notify the Athena Learning Trust Finance Director.

If there is any doubt about whether a particular act, the treatment of a person more generally, or their working conditions within Athena Learning Trust or any tier of supply chains may constitute any of the various forms of modern slavery, the matter should be raised with the Athena Learning Finance Director..

### **Enhanced Due Diligence**

Athena Learning Trust has reviewed its current practice and as a result will:

- Require all members of staff with procurement responsibilities to complete training on modern slavery to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.
- Raise awareness of modern slavery issues with members of staff, volunteers, Trustees and governors by sharing information and appropriate training, including
  - the basic principles of the Modern Slavery Act 2015;

- o how members of staff can identify and prevent slavery and human trafficking;
  - o what members of staff can do to flag up potential slavery or human trafficking issues with the relevant people within the organisation; and
  - o what external help is available, for example through the Modern Slavery Helpline.
- Review the Trust’s procurement policies and procedures to ensure that they are able to identify the risk of slavery and human trafficking and ensure that there is no slavery and human trafficking in the Trust’s business or supply chains.
  - Review the Trust’s existing contracts and suppliers to ensure that slavery and human trafficking is not taking place in its supply chains.
  - Develop a system for supply chain verification to ensure that potential suppliers are not allowing slavery or human trafficking to take place.
  - Evaluate and monitor the effectiveness of the steps taken by Athena Learning Trust to ensure slavery and human trafficking is not taking place in Athena Learning Trust schools, service units or supply chains.