

Bolton Impact Trust

Modern Slavery and Human Trafficking Statement

For the year September 2025 – August 2026

1. Introduction

Bolton Impact Trust ("BIT", "the Trust") is a multi-academy trust operating mainstream, specialist and alternative provision settings across Bolton, including Smithills School, Lever Park School, The Forwards Centre, Park School, Youth Challenge Academy and Egerton Community Primary School. We recognise that our schools, and everyone who works or learns within them, have a right to be free from exploitation in all its forms.

Slavery and human trafficking can take many forms, including forced labour, debt bondage, domestic servitude and human trafficking, all of which have the fundamental effect of depriving a person of their liberty in order to exploit them for personal or commercial gain. BIT is committed to acting ethically and with integrity in all of its activities and relationships, and to putting effective systems and controls in place to safeguard against any form of modern slavery or human trafficking taking place within the Trust or within our supply chains.

This statement has been approved by the Board of Trustees and is published on the Trust's website in accordance with section 54(7) of the Modern Slavery Act 2015. It will be reviewed and updated annually.

2. Structure, business and supply chains

BIT is a charitable company limited by guarantee and an exempt charity, company number 09971348, governed by a Board of Trustees and led by the Chief Executive Officer. The Trust employs teaching, support and central team staff across its academies and central office, all based in and around Bolton, Greater Manchester. BIT has two principal levels of operation: a trust level, which oversees the organisation as a whole, and a local level, such as an individual academy.

Our supply chains are predominantly UK-based and relatively low risk in nature, reflecting the size and geography of the Trust. They principally comprise:

- Catering and cleaning services
- Building maintenance, minor works and estates contractors
- Agency and supply staff, including specialist and therapeutic staff
- ICT hardware, software and educational resources and equipment
- Transport providers, including for pupils in alternative provision
- Professional services, including HR, legal, audit and recruitment support

The Trust operates solely within the United Kingdom and does not import goods directly from overseas. While this reduces exposure to some higher-risk jurisdictions, we recognise that risk can still arise indirectly, further down our supply chains, particularly in sectors known to carry higher modern slavery risk nationally, such as cleaning, catering, agency labour and construction/estates work. These areas form the focus of our risk-based due diligence.

3. Our policies on slavery and human trafficking

The Trust operates a number of policies that, together, support our commitment to preventing modern slavery and human trafficking:

- Child Protection and Safeguarding Policy – sets out how staff identify and respond to concerns about a child or young person's welfare, including indicators of exploitation, trafficking or county lines involvement.
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy – ensures robust pre-employment checks, right-to-work verification and identity checks for all staff, volunteers and agency workers, so that no one is employed against their will or under duress.
- Whistleblowing Policy and Procedure – provides a confidential route for staff to raise concerns, including any suspicion of exploitation or malpractice within the Trust or its supply chains, without fear of reprisal.
- Concerns and Complaints Policy
- Procurement and Contracts Policy, including supplier due diligence – requires consideration of ethical and modern slavery risk when appointing and reviewing suppliers and contractors.
- Code of Conduct – sets expectations for staff and Trustees regarding ethical behaviour, honesty and integrity in all Trust business.
- Supplier terms and conditions

These policies are available to all staff and are reviewed on a rolling programme by the Board of Trustees or its delegated committees.

4. Governance and oversight

The Deputy CEO is the Trust Safeguarding Lead, and each school has a Designated Safeguarding Lead, supported by a trust-wide Safeguarding hub. Collectively these colleagues implement policy and secure excellence in safeguarding practice across the Trust, working proactively with local authorities, local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Good practice is shared across schools, and safeguarding training always includes early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance, both locally and at Trust committees, and is subject to regular external audit. Safeguarding is a standing agenda item at the Trust's Standards Committee, with updates provided to the Risk & Audit Committee, which has overall oversight of the processes and practices embedded within BIT to reduce modern slavery risk. We have a named Trustee with responsibility for Safeguarding. Our Child Protection and Safeguarding Policy is reviewed annually by the Executive Leadership Team and approved by the Board of Trustees, and is fully compliant with Keeping Children Safe in Education (DfE).

We work closely with the National Joint Council (NJC) to help reduce risk by improving employee working and pay practices.

5. Due diligence and risk assessment

The Trust applies a risk-based approach to identifying and addressing modern slavery risk, considering sector risk, workforce characteristics, contract value, length of supply chain and safeguarding vulnerability. We recognise two main avenues of risk: safeguarding risk, covering child sexual exploitation or human trafficking that could directly affect our pupils or the staff of our contractors; and supply chain risk, relating to the vendors we contract with.

As part of our due diligence, the Trust:

- Uses safer recruitment practices for all appointments, including verification of identity, right to work in the UK, and references, in line with Keeping Children Safe in Education.
- Requires agency staff to be supplied only by reputable, vetted agencies that can demonstrate compliance with employment and immigration law, and that any on-site staff pass a DBS (Disclosure & Barring Service) check.

- Reviews key suppliers, particularly in catering, cleaning, agency labour and estates, and asks larger suppliers to evidence their own modern slavery policies or statements where relevant.
- Includes anti-slavery and ethical trading expectations within procurement documentation and contracts where proportionate to the value and risk of the contract, and publishes standard terms and conditions so providers are aware of our standards.
- Encourages staff to report any concerns about the treatment of contractors, agency workers or suppliers' employees on Trust sites, using existing safeguarding and whistleblowing routes.

Procurement is subject to internal audit review and is assessed by our external auditors annually. Frameworks via public sector buying organisations are considered for all tenders, and these meet the requirements of the Modern Slavery Act 2015 by default. Where we opt not to use an existing framework, tenders go through the Chief Financial and Operating Officer, at which point modern slavery risk is considered and incorporated into the tender evaluation criteria. Given the size, UK-only footprint and nature of our supply chains, our assessment is that the Trust's direct exposure to modern slavery risk is low, though we remain alert to indirect risk and will continue to strengthen our due diligence as the Trust grows.

6. Training and awareness

Every member of staff is trained on our policies (either in person or via e-learning) and is required to declare annually that they have read and understood them. Safeguarding induction and annual refresher training includes awareness of exploitation, trafficking and modern slavery indicators affecting children and young people, such as county lines exploitation. Designated Safeguarding Leads receive more detailed training to enable them to recognise and respond appropriately to concerns, and safeguarding CPD across the Trust includes a specific focus on modern slavery and human trafficking.

Staff involved in procurement, HR and finance are made aware of modern slavery risk indicators relevant to recruitment and supply chain management, so that they can identify and escalate concerns appropriately. We are fully satisfied that, through our robust safeguarding training, staff can identify and act appropriately for at-risk pupils, staff and contractors. We evaluate our processes for raising concerns to ensure there are clearly identified ways, available to all users of our estates, to report whistleblowing or modern slavery concerns.

7. Measuring effectiveness

We monitor the effectiveness of our approach through:

- The proportion of staff who have completed safeguarding and safer recruitment training, including awareness of exploitation and trafficking.
- Internal audit review of procurement compliance.
- The number of safeguarding referrals relating to exploitation.
- The number of whistleblowing concerns raised and addressed.
- Completion of modern slavery due-diligence checks for identified key suppliers.
- Ongoing review of supplier and agency arrangements, including at contract renewal.

No substantiated concerns or referrals relating to modern slavery or human trafficking have been made in relation to the Trust or its supply chains during the reporting period.

8. Looking ahead – priorities for 2026–2027

During the next reporting period we will:

- Further develop our risk-based supplier due-diligence process, focusing on higher-risk supply categories including cleaning, catering and agency staffing.
- Enhance procurement training and guidance for staff involved in supplier engagement.

- Reinforce staff awareness of modern slavery and exploitation as part of annual safeguarding training.
- Monitor any change in the Trust's income that may bring it within the statutory scope of section 54 of the Modern Slavery Act 2015, and adjust our reporting accordingly.

This reflects our ongoing commitment to continuous improvement in preventing modern slavery and human trafficking.

9. Approval

This statement was approved by the Board of Trustees of Bolton Impact Trust on 22 September 2026 and will be reviewed annually.

Signed:	Date:
Paul Hodgkinson Chief Executive Officer, Bolton Impact Trust	22 September 2026 On behalf of the Board of Trustees