

FOOTSTEPS TRUST MODERN SLAVERY STATEMENT

1. Statement of Commitment

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Footsteps Trust has taken to prevent modern slavery, human trafficking, forced labour and exploitation within its organisation and supply chains.

Footsteps Trust is committed to:

- Acting ethically and with integrity in all business activities.
- Preventing modern slavery and human trafficking.
- Promoting a culture of safeguarding and vigilance.
- Protecting children, young people and adults from exploitation.
- Ensuring robust recruitment, procurement and safeguarding procedures.
- Working collaboratively with partner agencies to identify and respond to concerns.

As an Alternative Provision, Footsteps recognises that some students may be particularly vulnerable to exploitation, including child criminal exploitation, child sexual exploitation, trafficking and modern slavery. This commitment therefore forms part of our wider safeguarding responsibilities.

2. Organisational Overview

Footsteps Trust is an Alternative Provision supporting students who may experience barriers to education, social exclusion, vulnerability or disadvantage.

The Academy delivers educational, pastoral and safeguarding support designed to improve educational outcomes, wellbeing and future opportunities for young people.

The Academy recognises its responsibility to promote ethical practice throughout all areas of its work and supply chain arrangements.

3. Legislative Framework

This statement has regard to:

- Modern Slavery Act 2015.
- Keeping Children Safe in Education (KCSIE) 2026.
- Working Together to Safeguard Children.
- Children Act 1989.
- Children Act 2004.

Date of Issue: September 2026

Date of Review: September 2027

- Equality Act 2010.
- Procurement Act requirements and public procurement principles.
- Independent School Standards.

The Academy recognises that modern slavery and trafficking are safeguarding issues and that all staff have a responsibility to identify and report concerns.

4. Understanding Modern Slavery

Modern slavery is a serious criminal offence and a violation of human rights.

It encompasses:

- Human trafficking.
- Forced or compulsory labour.
- Debt bondage.
- Domestic servitude.
- Child exploitation.
- Criminal exploitation.
- Sexual exploitation.
- Forced marriage.
- Labour exploitation.

Children may be particularly vulnerable due to grooming, coercion, manipulation and exploitation by adults or peers.

5. Safeguarding and Child Protection

Footsteps Trust Academy recognises that modern slavery and trafficking are child protection concerns.

In line with KCSIE 2026, staff will be alert to indicators that a child may be:

- Missing from education.
- Subject to child criminal exploitation.
- Subject to county lines activity.
- Experiencing child sexual exploitation.
- Being controlled or coerced.
- Living in unsafe circumstances.
- Showing signs of trafficking or exploitation.

Concerns will be managed through the Academy's safeguarding procedures and referred to appropriate agencies where necessary.

6. Roles and Responsibilities

Trustees / Proprietor

The Board will:

- Monitor safeguarding and modern slavery risks.
- Review this statement annually.
- Ensure appropriate policies and procedures are in place.
- Maintain oversight of recruitment and procurement practices.

Principal

The Principal will:

- Promote compliance with this statement.
- Support a culture of safeguarding and ethical practice.
- Ensure concerns are addressed appropriately.

Designated Safeguarding Lead (DSL)

The DSL will:

- Receive and manage safeguarding concerns relating to exploitation.
- Liaise with Children's Social Care, Police and other agencies.
- Maintain appropriate records.
- Ensure staff understand reporting procedures.

Staff

All staff must:

- Remain vigilant.
- Recognise indicators of exploitation.
- Report concerns immediately.
- Complete safeguarding training.

7. Staff Recruitment and Employment

The Academy is committed to preventing exploitation within its workforce.

The Academy will:

- Follow safer recruitment procedures.
- Verify identity and right to work.
- Undertake appropriate pre-employment checks.
- Maintain a Single Central Record.
- Ensure employment arrangements comply with employment legislation.

All employees working for Footsteps Trust Academy must be legally entitled to work in the United Kingdom.

8. Supply Chain Due Diligence

The Academy seeks to ensure that suppliers share our commitment to ethical and lawful practice.

Where appropriate, suppliers may be expected to demonstrate:

- Compliance with employment legislation.
- Ethical recruitment practices.
- Compliance with modern slavery legislation.
- Appropriate safeguarding standards.

The Academy procures a range of goods and services including:

- Educational resources.
- ICT equipment.
- Furniture.
- Catering services.
- Cleaning services.
- Construction and maintenance services.
- Printing and waste-management services.

Procurement decisions will seek to reduce the risk of exploitation within supply chains.

9. Recognising Indicators of Exploitation

Potential indicators may include:

- Unexplained absences.
- Frequent missing episodes.
- Signs of physical abuse.
- Fearful or withdrawn behaviour.
- Poor living conditions.
- Lack of control over personal finances.
- Evidence of coercion.
- Sudden possession of unexplained items or money.
- Association with controlling individuals.
- Signs of county lines involvement.

These indicators do not automatically mean exploitation is occurring but should prompt professional curiosity and safeguarding consideration.

10. Reporting Concerns

All concerns regarding modern slavery, trafficking or exploitation must be reported immediately to the DSL.

The DSL may:

- Undertake further assessment.
- Consult with Children's Social Care.
- Make MASH referrals.
- Contact the Police.
- Seek advice from specialist agencies.

The welfare and safety of children will always be the overriding consideration.

11. Training and Awareness

The Academy will ensure that staff receive:

- Annual safeguarding training.
- KCSIE updates.
- Information regarding modern slavery and trafficking.
- Training relating to exploitation, county lines and contextual safeguarding where appropriate.

The Academy will continue to raise awareness throughout the organisation regarding exploitation risks.

12. Student Education

Through safeguarding, PSHE, RSHE and personal development programmes, students will receive education appropriate to their age and needs regarding:

- Personal safety.
- Exploitation risks.
- Healthy relationships.
- Criminal exploitation.
- County lines.
- Online safety.
- How to seek help.

This supports the Academy's preventative safeguarding approach.

13. Related Policies

This statement should be read alongside:

- Safeguarding and Child Protection Policy.
- Behaviour Policy.
- Recruitment and Safer Recruitment Policy.
- Whistleblowing Policy.
- Code of Conduct.
- Procurement Procedures.
- Equality Policy.
- Online Safety Policy.

14. Monitoring and Review

Trustees, the Principal and DSL will monitor:

- Safeguarding trends.
- Exploitation-related concerns.
- Recruitment compliance.
- Supply-chain risks.
- Staff training completion.

This statement will be reviewed annually or sooner if legislation, safeguarding guidance or organisational arrangements change.