**Modern Slavery Statement**

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by the Shaw Trust Group, which comprises:

Careers Development Group, Disabled Living Foundation, Forth Sector; Forth Sector Development Limited; Good Work Partners, Homes2Inspire Ltd; Homes2Inspire Services Ltd; Ixion Holdings (Contracts) Ltd; Ixion CG Ltd, Ixion Social Enterprise Ltd, Prospects Distribution Services Ltd, Prospects Education Services Ltd, Prospects Group 2011 Ltd; Prospects Services, Prospects Services Midco Ltd, Shaw Trust International Partnerships Ltd; and Shaw Southern Australia Ltd.

It covers the period August 2025 – August 2026 to prevent Modern Slavery and Human Trafficking in its own business operations and within supply chains.

**Introduction**

Shaw Trust is fully committed to the Modern Slavery Act 2015 and the duty it places on large organisations to disclose publicly the steps they are taking to prevent modern slavery organisationally and, in their supply chains.

Shaw Trust Policies and procedures include and will continue to be enhanced to ensure that all the required provisions to guide and embed standards of good practice, monitor compliance and prevent modern slavery.

At Shaw Trust we take pride in our ‘charitable heart with a commercial brain’ approach. Our focus is to deliver quality services that also maximise social value and social investment to communities. This approach allows us to meet:

**Our Vision**

A future where good employment is accessible to all in society irrespective of life circumstances.

**Our Mission**

To help individuals facing barriers to work and social inclusion to achieve their full potential.

To multiply our social impact by delivering innovative system-change partnerships and programmes.

**Business and Operational Structure**

Shaw Trust is the UK’s largest Not-for-Profit (NFP) social enterprise in the employment sector and one of the largest charities in the UK. The Shaw Trust Group employs over 2,900 staff.

**Shaw Trust owns:**

* Careers Development Group
* Disabled Living Foundation Ltd
* Forth Sector
* Forth Sector Development Limited
* Good Work Partners
* Homes2Inspire Ltd
* Homes2Inspire Services Ltd
* Ixion CG Ltd
* Ixion Holdings (Contracts) Limited
* Ixion Social Enterprise Limited
* Prospects Distribution Services Ltd
* Prospects Education Services Ltd
* Prospects Group 2011 Ltd
* Prospects Services
* Prospects Services Midco Ltd
* Shaw Education Trust
* Shaw Trust International Partnerships Ltd
* Shaw Southern Australia Ltd

Shaw Trust uses several suppliers across all its functions, to enable it to carry out its charitable and business purposes.

**Key Focus Areas**

In 2025/2026 we will focus on:

* **Understanding the Risk of Modern Slavery with Shaw Trust Suppliers –** Through the completion of a desk- based research exercise identifying risk levels against our current supply chain
* **Procurement –** Additional questions will be added during the procurement process to embed PPN 02/23 Tackling Modern Slavery in Government Supply – guidance.
* **Contracting and policy development –** Continual enhancement of due diligence exercises to align with good practice guidance to support identifying risk levels against our current supply chain
* **Raising awareness and incident reporting –** Review the mandatory modern Slavery training package and create/deliver a 12-month comms plan across the group to raise awareness of topic areas i.e. debt bondage. Introduce online incident reporting tool for Commercial Contracting Supply Chain Partners and implement a Service Level Agreement for responding to suspected instances of modern slavery
* **Data and Insight –** Scrutinise quarterly incident reporting data through the audit and risk committee and the strategic safeguarding group.

Quality check reported incidents and risk management.

**Governance Structure**

* Our organisational lead on Modern Slavery and Human Trafficking is the Chief Strategy and Risk Officer. (CSRO)
* We have a named lead for Safeguarding within the Board of Trustees.
* We have a Group Safeguarding Lead.
* We have named Designated Leads for safeguarding at directorate level.
* Our work in relation to Modern Slavery is supported and guided within the following policies:
  1. Shaw Trust Safeguarding Policy and Framework.
  2. Safer Recruitment Policy.

Policy, performance, and risk is reported and monitored through the following framework.

**Responsible Recruitment**

Shaw Trust have a Safer Recruitment Policy which includes the following information:

* We only use recruitment agencies who are on our preferred supplier list and have gone through our due diligence process.
* Independent teams who employees can contact, e.g. HR Support Services (HRSS) for queries.
* Provide mandatory training for hiring managers on Safer Recruitment.
* Complete background checks on new joiners – DBS and reference checks.
* Candidates must have the right to work in the UK (Right to Work ID must be provided at the offer stage). We ask this during the application process and auto reject applicants who do not have the right to work in the UK.

**Training and Awareness**

All Shaw Trust Staff complete a Modern Slavery training module within the first six months of working with Shaw Trust. The module is reviewed annually by the Group Safeguarding Lead.

Training completion is monitored by Shaw Trust Learning and Development Team and reported into the Audit and Risk Committee quarterly.

Staff have access to information and resources from the Home Office and the NGO Anti-slavery international organisation ([www.antislavery.org](https://www.antislavery.org/)) via our Safeguarding Intranet page, the Loop.

Shaw Trust provide the following information to staff throughout the year which includes Modern Slavery topics:

* Monthly communications on topic areas.
* Resources within the document hub.

**Due Diligence**

Shaw Trust (including its subsidiary legal entities) operates under a Supply Chain Management Framework (SCMF). The SCMF aims to set a consistent standard for the management of Supply Chain Partners (SCP) across Shaw Trust and thereby drive the behaviours required to operate to the benefit of our commissioners, adhere to key performance expectations and legislation, and seeks to ensure we are providing value for money at every stage. Within the SCMF we set out our approach to due diligence of our SCPs.

**Selection, Due Diligence and Onboarding**

When identifying SCPs for inclusion as part of our commissioner-based contracts, we will hold an Expression of Interest process led by our Partnerships Team or if new partners are required during a contract period, we will lead an Invitation to Tender procurement process.

We expect high standards and assurances regarding Modern Slavery, Safeguarding and Responsible Recruitment across our supply chain as part of this process. Ahead of onboarding a partner, we will gather and assess a range of information including policies and processes which are assessed by Subject Matter Experts from across the organisation. All partners prior to onboarding are signed off by a senior leader as part of the delegated authority process.

We will always work with our commissioners and supply chain partners to ensure fair pricing under the principles of the UK Prompt Payment Code to minimise the risks of Modern Slavery.

**Key Performance Indicators**

Shaw Trust is committed to monitor a set of key performance indicators in relation to Modern Slavery. These include:

* The delivery and monitoring of all staff and volunteers completing the mandatory Modern Slavery training module.
* Reporting and monitoring all Modern Slavery concerns raised through our central incident reporting function to the Risk and Audit committee and the Strategic Safeguarding Group.

**Authorised by**

This statement was approved by the Shaw Trust Board of Trustees on 26 February 2025 and signed on their behalf by:

**Signed:**



**Chris Luck CB MBE DL**  
**Chief Executive**