Cardiff Academy

STATEMENT /// GOVERNANCE AND CORPORATE

Modern Slavery and Human Trafficking Statement

Cardiff Academy's voluntary statement on the steps it takes to make sure that modern slavery and human trafficking are not taking place in its business, its recruitment of students and staff, or its supply chains.

REFERENCE	**CA-GOV-06**	VERSION	**1.0 (Approved)**
POLICY OWNER	**Chief Executive Officer**	APPROVED BY	**Board of Governors**
ISSUE DATE	**October 2026**	APPROVAL DATE	**October 2026**
REVIEW CYCLE	**Annual**	NEXT REVIEW DUE	**October 2027**
APPLIES TO	**Public; staff; agents and suppliers**	PUBLISHED	**Website (signed statement)**

RELATED POLICIES CA-GOV-05 Anti-Bribery, Corruption and Fraud; CA-GOV-12 Education Agent Recruitment and Management; CA-HR-01 Safer Recruitment; CA-WEL-01 Safeguarding and Child Protection

LEGAL ENTITY Cardiff Education Group Ltd, trading as Cardiff Academy (Company No. 14569122). Registered office: 168 City Road, Cardiff CF24 3JE. Teaching premises: 8 Drake Walk, Cardiff CF10 4LG

1 Introduction

This statement is made voluntarily by Cardiff Education Group Ltd, trading as Cardiff Academy, for the financial year ending **31 January 2026**. Although the Academy is below the turnover threshold that makes a statement mandatory under section 54 of the Modern Slavery Act 2015, we publish this statement because our university partners and students expect transparency, and because we recruit students internationally and work with overseas agents.

2 Our organisation and supply chains

Cardiff Academy is an independent pathway and English language provider based in Cardiff, Wales, preparing international and UK students for study at UK universities. Our main supply chains and relationships are:

- education agents and sub-agents in the UK and overseas who refer students
- suppliers of premises, cleaning, security, maintenance, IT, catering, printing, learning materials and marketing services
- contractors and freelance teachers
- partner universities and sponsors

3 Policies

Our commitment is supported by:

- CA-GOV-05 Anti-Bribery, Corruption and Fraud Policy
- CA-GOV-12 Education Agent Recruitment and Management Policy
- CA-HR-01 Safer Recruitment Policy (including right-to-work checks)
- CA-WEL-01 Safeguarding and Child Protection Policy (which recognises modern slavery, trafficking and exploitation as forms of abuse)
- CA-GOV-10 Whistleblowing Policy

4 Risk assessment and due diligence

We consider the highest risks in our operations to be:

- **Student recruitment:** the risk that a person could be brought to the UK under the guise of study for the purpose of exploitation, or that students could be charged excessive fees or placed in debt bondage by unscrupulous intermediaries.
- **Outsourced services:** cleaning, security and maintenance contracts, where low pay and agency labour can increase the risk of exploitation.

Our controls include:

- verifying the identity, motivation and finances of every international applicant, and interviewing applicants before an offer
- requiring agents to disclose all fees they charge to students and prohibiting agents from holding students' passports or charging fees for Academy services beyond those we publish
- monitoring attendance and engagement, which can reveal students who are being controlled or exploited
- staff training to recognise indicators of trafficking, forced labour and exploitation
- requiring suppliers of labour-intensive services to confirm they pay at least the National Living Wage, check right to work and comply with the Modern Slavery Act 2015
- including modern slavery clauses in agent and supplier contracts, with audit and termination rights

5 Reporting concerns

Any concern that a student, staff member or worker may be a victim of modern slavery is a safeguarding matter and must be reported to the Designated Safeguarding Lead immediately. The DSL will make referrals to the police and, where appropriate, through the National Referral Mechanism. Anyone can also call the Modern Slavery and Exploitation Helpline on 08000 121 700.

6 Training

All staff receive awareness training on modern slavery and trafficking as part of safeguarding training. Admissions and agent management staff receive additional training on recruitment-related risks.

7 Measuring effectiveness

We will report annually on: the percentage of agents and key suppliers that have signed contracts containing modern slavery clauses; the percentage of staff trained; and the number of concerns raised and actions taken.

8 Approval

This statement was approved by the Board of Governors in October 2026 and is signed by a director.

Signed: Sajid Hussain, Director, Cardiff Education Group Ltd · Date: October 2026

Compliance mapping

This policy has been written to meet, and to evidence, the following external requirements. Inspectors and university partners can use this table to locate the relevant provisions.

University partner due diligence	Partner due diligence – modern slavery statement or equivalent commitment expected of partners and suppliers
Legislation and statutory guidance	Modern Slavery Act 2015 (section 54 transparency reporting is mandatory only above £36m turnover; this statement is published voluntarily); Wales Code of Practice: Ethical Employment in Supply Chains (voluntary)

Document control

Version	Date	Author / reviewer	Summary of changes
0.9	Pre-2026	Various	No equivalent Cardiff Academy policy
1.0	October 2026	Chief Executive Officer	New policy written for university partnerships, ISI Educational Oversight and British Council Accreditation UK. Supersedes all previous versions.

APPROVED ON BEHALF OF THE BOARD	SIGNATURE	DATE
Chair of the Board of Governors		