Academies Trust

Anti-slavery & Human Trafficking Policy

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- Policy owner - Head of Governance and Company Secretary

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1. Policy Statement
2. Responsibility for the policy
3. Compliance with the policy
4. Communication and awareness of this policy
5. Breaches of this policy
6. Review

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1. Policy statement

1.1
This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, trustees, Community Council Members or their equivalent, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.2
This policy does not form part of any employee's contract of employment.

1.3
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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.4
We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.5
As a group of schools, we are also committed to raising awareness of modern slavery & human trafficking through our work with pupils / students, and to ensuring that our staff working in the family support / child protection field are equipped to deal with cases involving our pupils / students which may relate to human trafficking.

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2. Responsibility for the policy

2.1
The Trust Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2
The Deputy Chief Executive Officer (DCEO) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3
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 on it and the issue of modern slavery in supply chains. They should escalate any concerns through their Headteacher/Principal to the DCEO.

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3. Compliance with the policy

3.1
You must ensure that you read, understand and comply with this policy.

3.2
The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3
If you believe or suspect a breach of this policy has occurred or that it may occur (either within the Trust, or in the supply chain of any supplier) you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.4
If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the DCEO.

3.5

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should escalate this matter within your academy or, if this is not possible, to the DCEO.

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4. Communication and awareness of this policy

4.1
Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2
Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter[1].

4.3
This policy should be read in conjunction with the Whistleblowing Policy and the annual Modern Slavery Statement.

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5. Breaches of this policy

5.1
Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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6. Review

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the DCEO via finance.team@coopacademies.co.uk

The Trust will review this policy every 4 years and/or if any significant changes in legislation occur. We reserve the right to amend this policy at any time.

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1 This would be included in the tender documentation as a specific requirement that potential suppliers have to confirm compliance with (similar to health and safety and insurance matters); and also included in the T&C's of contracts awarded.