HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

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Introduction

Modern slavery is a criminal offence under the Modern Slavery Act 2015 and encompasses slavery, servitude, human trafficking and forced labour 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. This document sets out The Basildon Academies policy in relation to modern slavery with the aim of preventing opportunities for modern slavery to occur within its business or supply chain and safeguarding any customers who may be at risk.

This policy applies to all individuals working for or with The Basildon Academies in any form, including our supply chain, contractors, employees and all other business partners.

This policy underpins our published Slavery and Human Trafficking Statement.

Background

The Modern Slavery Act 2015 was introduced to specifically address slavery and trafficking in the 21st century.

The new legislation was introduced to significantly enhance support and protection for victims, gives law enforcement the tools they need to target today's slave drivers, ensures perpetrators can be severely punished, and includes a world leading provision to encourage business to take action to help ensure their end-to-end supply chains are slavery free.

An overview of the Modern Slavery Act 2015:

The Act includes provisions to:

- Enable the Secretary of State to make regulations relating to the identification of and support for victims
- Make provision for independent child trafficking advocates
- Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- Close gaps in the law to enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- Require businesses over a certain size and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply
- An additional clause (clause 6) was added retrospectively to the act and requires organisations to report on the processes and due diligence taken to ensure that their supply chains are slavery free. The Transparency in Supply Chains clause came into force in Oct 2015 and

requires organisations with a turnover of £36 million or more to produce and publish a slavery and human trafficking statement each financial year

Our approach

Our principal activities are the provision of primary and secondary education

The Basildon Academies has a zero tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

We have a number of related policies and strategies which will support us in ensuring compliance with the Modern Slavery Act, these include:

- Code of Conduct
- Equal Opportunities Policy
- Gifts, Hospitality Policy
- Safeguarding Children in Education Policy
- Recruitment Procedures Policy
- Pay Policy

We are therefore well placed to make a positive contribution to preventing opportunities for modern slavery to occur within our business and our supply chain.

Ensuring compliance with the Modern Slavery Act.

Procurement and supply chain

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

The biggest risk to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the Modern Slavery Act we will endeavour to eliminate the risks as much as possible.

We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the Modern Slavery Act.

Responding to modern slavery and trafficking within our supply chain

If an employee suspects that modern slavery and/or trafficking may be occurring within our supply chain in the first instance concerns should immediately be raised with the Headteacher of the school.

The Headteacher should then:

- Call the police on 999 in an emergency and;
- Contact the Gangmasters Licensing Authority (GLA) on 0345 602 5020 or email: intelligence@gla.gov.uk . When contacting the authorities the reporting manager will need to be clear about the circumstances and why it is considered that it is a case of modern slavery/human
- Immediately inform the Chair of the Trust Board who will then determine the appropriate action to take depending on circumstances/advice given by the authorities.

Education services

Many of our employees come into contact with members of the public. In doing so there is the possibility that they could encounter somebody believed to be at risk of modern slavery and/or trafficking. Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities or socially-excluded groups.

Responding to modern slavery and trafficking:

Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures must be followed whenever an employee suspects that someone is at risk. In accordance with our safeguarding policies you should always call the Police on 999 in an emergency.

All frontline employees receive multi-agency Safeguarding Children training which incorporates modern slavery. These employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our Safeguarding policies and procedures so that they are able to respond appropriately. Line managers must ensure that safeguarding training is kept up to date.

Safeguarding is everyone's responsibility.

Breaches of this policy

The Basildon Academies employees:

- All employees are expected to act in accordance with this policy to minimise the risk of modern slavery and trafficking. Any member of staff found to be wilfully neglectful in responding to concerns may face disciplinary action.

Suppliers, contractors and external partners:

- In addition to reporting breaches to the appropriate authorities as outlined in section 4.2 The Basildon Academies reserve the right to terminate the contract/partnership where a supplier, contractor or external partner has been found to be in breach of the Modern Slavery Act.

If any employee feels The Basildon Academies is not meeting its obligations under the Modern Slavery Act:

If an employee is concerned that The Basildon Academies or an individual is not meeting their obligations in relation to this policy, in the first instance they should raise the concern with their line manager, or Headteacher. If this is not appropriate, for example if the concern involves your line manager or Headteacher then concerns can be raised with the Chair of the Trust Board.

Communication and awareness of this policy

Our zero-tolerance to modern slavery will be communicated:

- To all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate
- We will also launch this policy through team briefings

Review

This Modern Slavery and Human Trafficking Policy will be reviewed annually.

Further information and advice:

- Home Office website https://www.gov.uk/government/collections/modern-slavery
- Modern Slavery website https://www.modernslaveryhelpline.org/report
- Modern Slavery helpline 0800 0121 700