

**Woodard Academies Trust  
Modern Slavery Policy**

## 1. Policy statement

1.1 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 to exploit them for personal or commercial gain.

Woodard Academies Trust is a provider of state funded education to children and young people from the ages of 4 to 19 years. The Trust welcomes students and staff of all faiths and none. As an organisation with a Christian Ethos expressed as Faith, Unity and Vision the Trust takes seriously the call to work for a just and equal society, upholding the human rights and values of freedom, respect, fairness and independence for all. We are committed to ensuring the protection and safety of all students, staff, volunteers, agency workers and contractors within our organisation.

The Trust is 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 academies and schools and in any of our supply chains.

1.2 The Trust is also committed to ensuring there is transparency in our organisation 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 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.

1.3 This policy applies to all persons working or volunteering for Woodard Academies Trust, this includes, executive directors, central staff, academy principals, teaching and support staff, apprentices, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and the Trust may amend it at any time.

## 2. Responsibility for this Policy

2.1 The Board of Trustees 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 Executive and Academy Principals have primary and day-to-day responsibility for implementing this policy as it impacts on their areas of responsibility, 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 Academy Principals and managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular awareness training on it and the issue of modern slavery in supply chains.

2.4 All stakeholders 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 designated central office director responsible for HR.

### **3. Compliance with this policy**

3.1 All employees and volunteers must ensure that they have read and understood 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 You must notify your manager or key contact as soon as possible if you believe or suspect that a conflict with this policy has occurred, or that it may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with the Trust's Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Trust's organisation, or our supply chains constitutes any of the various forms of modern slavery, raise it with your Academy Principal or the designated central office director responsible for HR in the first instance. Principals must advise the designated central office director responsible for HR and thereby the Executive of any form of concern about modern slavery.

3.7 The Trust aims 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. The Trust is 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 as an employee or worker believes that you have suffered any such treatment, you should inform your Principal or the designated central

office director responsible for HR immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure. Volunteers should raise concerns with the Principal or Chair of Academy Council as appropriate.

#### 4. Communication

4.1 Training on this policy, and on the risk our organisation faces from modern slavery in its day to day operations and 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 will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. Breaches of this policy

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

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

#### 6. Related policies and procedures

##### ***Recruitment Policies and Procedures, including Safer Recruitment:***

Woodard Academies Trust undertakes right to work checks on all employees. Academy and Central team roles also require a Disclosure and Barring Service check. These checks safeguard against human trafficking or individuals being forced to work against their will.

##### ***Pay and Payroll:***

The Trust's payroll provision which includes new starter processes and pay changes through HR and Payroll teams in Academies and the Centre means that all employees are in receipt

of pay which is at least above the National Minimum Wage rate. There are no local pay policies and Trust Pay Policies provide a clear framework for pay.

##### ***Disciplinary Policy:***

The Trust's Disciplinary Policy provides a clear process for investigation of any allegation before a case is considered at a Disciplinary Interview. There is a right of appeal and the right for individuals to be accompanied by a work colleague or union representative.

**Whistleblowing Policy:**

The Trust's Whistleblowing policy is available so that all employees know they can raise concerns about how colleagues are being treated without fear of reprisals.

**Trustees and Academy Councillors:**

Appointments to the Board or Academy Council are made through a robust process. Staff and parent councillors go through an election process. Enhanced DBS checks are carried out for all such volunteers.

**7. Review of this Policy**

This policy will be reviewed annually by the Board of Trustees and in line with the Trust's financial year. The issue of Modern Slavery will be included in the Trust's Risk Register and monitored within that framework.

The requirement for providing this policy applies to the Academy Financial Year 2020 - 2021.

Signed: Chair of Trustees

Date: 31 March 2020

Adopted by Board of Trustees	31 March 2020
Review date	January 2021