

MODERN SLAVERY POLICY & STATEMENT

Learning Academies Trust

Version: 1.0

Approved by: Finance Committee

Last review date: n/a

Ratified date: 21 July 2022

Next review date: 21 July 2025



LEARNING
ACADEMIES TRUST

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CHANGES

Policy date	Summary of change	Author	Version	Review date
01/07/2022	Policy has been created.	Kay Mabin, CFO	1.0	01/07/2022

1. AIMS

The UK Modern Slavery Act 2015 requires organizations with a turnover of more than £36m to make a public statement on steps they are taking to identify and prevent modern slavery and human trafficking in their operations and supply chains.

2. LEGISLATION AND GUIDANCE

Modern Slavery Act 2015: [MODERN SLAVERY ACT 2015 \(LEGISLATION.GOV.UK\)](https://www.legislation.gov.uk/ukpga/2015/31/section-54)

3. DEFINITIONS

Term	Definitions
SLT	Senior Leadership Team

4. MODERN SLAVERY STATEMENT

Learning Academies Trust is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the procurement of public funds and the management of its activities.

Learning Academies Trust will undertake appropriate due diligence in respect of its suppliers as part of its normal course of business.

1. Learning Academies Trust adopts zero tolerance to corruption and bribery and this policy is endorsed by our Board.
2. Learning Academies Trust fully supports the terms of The Modern Slavery Act 2015 and the government's objectives to eradicate modern slavery and human trafficking.
3. Our annual statement will report on the steps that we have taken during the financial year to ensure that slavery and human trafficking are not taking place in our business or in our supply chain.
4. Learning Academies Trust is committed to implementing steps to prevent modern slavery in the supply chain. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability so that together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

In taking steps to prevent modern slavery in the supply chain we will expect all parties with whom we contract to confirm adherence in writing to our policy, that they and their suppliers have or shall similarly adopt a policy no less onerous than our own, such confirmation to be given either during the tender process ahead of any award of any business intended to be contracted, as part of any contract terms that are entered into subsequent to a tender award or on renewal of any contracted business.

5. A full copy of this policy and a copy of The Modern Slavery Act will be accessible to all of our employees electronically. An understanding of our policies, including this policy, forms part of our training to new staff.

Existing employees will receive training in respect of our policies and procedures from time to time

5. MODERN SLAVERY POLICY

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.

LEARNING ACADEMIES TRUST 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 within the Trust or in any of our supply chains.

We are also 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.

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

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

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.

The Chief Finance Officer 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.

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.

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 Chief Finance Officer.

6. COMPLIANCE WITH THE POLICY

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

The prevention, detection and reporting of modern slavery in any aspect of the Trust's 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.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any aspect of the Trust's business or supply chains of any supplier tier at the earliest possible stage.

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

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 line manager or the Chief Finance Officer.

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 within the Trust 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 inform the Chief Finance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

7. COMMUNICATION AND AWARENESS OF THIS POLICY

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.

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.

All Senior Leadership Team (SLT) will complete an evidenced, online or equivalent training package every 3 years or if legislation changes.

All appointed contractors will be expected to adhere to this policy and evidence of this may be requested at any time.

8. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action.

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