

<b>Title</b>	Modern Slavery and Human Trafficking Statement
<b>Associated Policies</b>	<ul style="list-style-type: none"> <li>• Single Equalities policy (TPO/EO/01)</li> <li>• Anti-bribery and Corruption policy (TPO/QA/01)</li> <li>• Whistleblowing policy (TPO/STA/19)</li> <li>• Governance charter</li> <li>• Recruitment policy (TPO/STA/27)</li> <li>• Safeguarding policy (TPO/HS/05)</li> <li>• Procurement policy (TPO/FIN/04)</li> </ul>

REVIEWED: September 2020  
2021

NEXT REVIEW: September

**1. Modern Slavery 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 in order to exploit them for personal or commercial gain. We take a zero-tolerance approach to modern slavery and ensure we act ethically and with integrity in all our business dealings and relationships. We are committed 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.
- 1.2 In accordance with section 54 of the Modern Slavery Act 2015, Brooke Weston Trust (BWT) is committed to combatting and preventing modern slavery in its operations and in its supply chain. BWT is a multi-academy trust which operates ten schools across Northamptonshire and Cambridgeshire and employs over 1000 staff.

**2. Responsibility for the policy**

- 2.1 The Board of Directors 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 Chief Executive, Executive Principals and other senior leaders are responsible for the implementation of the policy, monitoring its use and effectiveness and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 The Finance Director and HR Manager and any other persons responsible for purchasing and/or recruitment are responsible for complying with this policy and dealing with any queries about it.
- 2.4 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.
- 2.5 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

**3. Our policy on slavery and human trafficking**

- 3.1 We are committed to understanding modern slavery risks and ensuring that there is no modern slavery or human trafficking within our own establishment, or in our supply chains. We are committed to acting ethically and with integrity in all of our business relationships. This will be achieved through regular training amongst our staff regarding the risks of modern slavery and how to identify it and the

communication of our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate.

- 3.2 We are committed to implementing and enforcing systems and controls to ensure modern slavery is not taking place in our business or in our supply chains. Appropriate due diligence will be undertaken where required, including how suppliers and tenders are evaluated.
- 3.3 The Trust implements several policies which help to support our anti-slavery stance, including:
  - Anti-bribery and corruption policy
  - Whistleblowing policy
  - Governance charter
  - Recruitment policy
  - Safeguarding policy
  - Procurement policy
  - Single equalities policy
- 3.4 We are confident that our policies promote anti-slavery practices amongst our colleagues – these are reviewed and updated on a regular basis to ensure they remain robust, legally compliant and in line with best practice.
- 3.5 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.
- 3.6 All staff are regularly encouraged to raise any concerns relating to modern slavery within the Trust’s direct activities or supply chains to their line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

**4. Our supply chain**

- 4.1 We buy a range of goods and services in accordance with public sector procurement legislation. Our supply chains include agencies (e.g. for cover for absent teachers), specialist services (e.g. legal, audit, occupational health and employee assistance), contractors (e.g. building and maintenance works) and suppliers (e.g. catering supplies, equipment, facilities).
- 4.2 Suppliers to the Trust are required to fully comply with the Modern Slavery Act 2015 and are confirming that they do so in writing. The Trust’s reserves the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015.
- 4.3 Furthermore, we encourage the contractor to include relevant clauses in their own contracts with suppliers and sub-contractors, with the aim of enforcement higher up the chain.
- 4.4 To ensure all those in our supply chain and contractors comply with our values we will be implementing a supply chain compliance programme. Where there is deemed to be a potentially significant risk of modern day slavery we will work with partners to conduct supply chain mapping, to enable us to determine, where the risk exists and determine an appropriate course of action.

**5. Training**

- 5.1 We have discussed the Act, its purpose and the Trust’s attitude to it at a Board of Directors meeting. We have cascaded the information to the Executive Leadership team who have been tasked with raising awareness of the Act amongst our members of staff.
- 5.2 Senior colleagues and those responsible for purchasing and/or recruitment will receive equalities training, with a specific focus on modern slavery and our main risks in this area.
- 5.3 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.

**6. Risk management**

- 6.1 Risk management is embedded in the day to day operation of the Trust. Trustees and Senior Management have formally identified and documented the major risks to which we are exposed. The following risk management strategies will be undertaken throughout 2020/2021:
- A definition of modern slavery criteria will be included in our specification and tender documents and will emphasise that if any such conditions or practices are found, the contract will be nullified and the company will be reported to the relevant authorities
  - Suppliers will be asked to include a written acknowledgement to confirm that they support and uphold the requirements set out in the Modern Slavery Act 2015
  - The Trust's Financial Handbook will be updated to include reference to the Modern Slavery Act and incorporate procurement procedures and processes
  - The staff induction policy and individual school staff handbooks will be reviewed and training provided to ensure all staff are aware of the risks of Modern Slavery and how to report their concerns.
- 6.2 Our internal auditor carries out regular testing of internal procedures and controls, including adherence to policies and procedures. Any areas of non-compliance regarding concerns of modern slavery within our organisation or with our suppliers will be included in internal audit reports, which are communicated to senior managers and the Audit & Risk Committee and appropriate actions taken.

## 7. Statement summary

- 7.1 **The Board of Directors of Brooke Weston Trust is the responsible body of all academies within the Trust. This statement has been approved by the Trust Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.**

Signature:



Position: Chief Executive

Date: 29/03/2019