



WADE DEACON
TRUST

A COMMITMENT TO EXCELLENCE

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Policy Number: 98

Version Number: 01

Ratified by Trustees: 13th September 2023

Next Review Date: 13th September 2026

Link: Mr J Lowe

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1. INTRODUCTION

- 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. Wade Deacon Trust has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the business or in any of its schools.
- 1.2. Wade Deacon Trust is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout the Trust, consistent with disclosure obligations under the Modern Slavery Act 2015. The Trust expects the same high standards from all its contractors, suppliers and other business partners, and as part of its contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Trust expects all its suppliers to hold their own suppliers to the same high standards.
- 1.3. This policy applies to all persons working for Wade Deacon Trust or on the Trust's behalf in any capacity, including employees at all levels, Trustees, governors, officers, 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 may be amended at any time.
- 1.5. Wade Deacon Trust pays the Living Wage Foundation rate to all employees.
- 1.6. Wade Deacon Trust ensures all staff have regular Modern Slavery and Human Trafficking (MSHT) training.
- 1.7. Wade Deacon Trust will not award contracts to suppliers based simply on price, and always considers that way in which the suppliers treat staff and workers.
- 1.8. Wade Deacon Trust ensures that, where practical, contractual arrangements are put in place to ensure that suppliers comply with the Modern Slavery Act.

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 Chief Executive Officer, the Executive Team and the Trust's Academy Principals have 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. Management 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.
- 2.4. Comments, suggestions and queries regarding this policy are encouraged and should be addressed to the Chief Executive Officer or any member of the Trust's Executive Team.

3. COMPLIANCE WITH THE POLICY

- 3.1. Employees must ensure they have read, understood and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of the Trust's business or schools is the responsibility of all those working for the Trust or under the Trust's control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. Employees must notify their line manager, the Chief Executive Officer or any other member of the Trust senior leadership team as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Trust's business or schools or any supplier tier at the earliest possible stage.
- 3.5. If employees believe or suspect a breach of this policy has occurred or that it may occur they must notify their line manager, the Principal, the Chief Executive Officer or any other Executive Team member.
- 3.6. Any breach of this policy can alternatively be reported in accordance with the Trust's Whistleblowing Policy (available on the Trust website) as soon as possible.
- 3.7. If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Trust's business constitutes any of the various forms of modern slavery, they must raise it with their line manager OR Principal OR Chief Executive Officer OR any other Executive Team member.

3.8. 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 the Trust's business or in any of its schools. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe they have suffered any such treatment, they should inform the Chief Executive Officer or any other Executive Team member immediately. If the matter is not remedied an employee may raise it formally using the Trust's Grievance Procedure (available to employees from Human Resources).

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1. Training on this policy, and on the risk the Trust's business faces from modern slavery will be provided as necessary.
- 4.2. This policy should be read in conjunction with the Modern Slavery and Human Trafficking Statement, Whistleblowing Policy, Staff Code of Conduct and Disciplinary Policy.

5. BREACHES OF THIS POLICY

- 5.1. The Trust may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.