




The best we can be

Modern Slavery Policy

Policy Number and Version:	Version 1
Policy Authorisation:	FCAT Directors
Date of Policy Introduction:	10 th January 2019
Frequency of review:	Annual
Authorised Signatory: John Boyle Chair of Directors	

POLICY STATEMENT

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 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 in our own business 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, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

RESPONSIBILITY FOR THE POLICY

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.

The Chief Operating 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.

Within our academies, the Principal and the Local Governing Body are responsible for ensuring compliance with this statement in relation to any parties working with or on behalf of that academy.

Individually, employees are responsible for notifying their line manager should they become aware of any activities, within the Trust or by any of its external suppliers or partners, that is not compliant with the Statement of Intent above.

COMMUNICATION OF THIS POLICY

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.

ACTIONS TAKEN

The Trust is fully committed to embedding the principles and responsibilities set out in the Modern Slavery Act 2015 in all elements of our business practice. To deliver on this commitment the Trust intends to put the following procedures in place during the 2018/19 financial year:

We will include a definition of modern slavery conditions or criteria in our specification and tender documents wherever possible, and emphasis that if evidence of any such conditions or working practices are found, the contract will be nullified and the Trust will report the company to the relevant authorities;

We will refuse to award contracts to suppliers who fail to demonstrate their commitment to ensure that modern slavery and human trafficking are not taking place in their own business or supply chains;

We will update the new supplier details for to include an acknowledgement from suppliers to confirm that they support and uphold the requirements set out in the Modern Slavery Act 2015;

We will update the Trust's Financial Regulations to reflect the procedures outlined in this policy

BREACHES OF THIS POLICY

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

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