



# Modern Slavery Act Statement

<b>Monitoring and Evaluation</b>	
Original implementation date:	December 2021
Review frequency:	2 years
Date of next Review:	June 2025
Review delegated to:	People Committee

### **Document Version control**

<b>Version</b>	<b>Changes made</b>	<b>Date</b>
1.0	Initial set up of Trust-wide policy	December 2021
2.0	Formatting, updates and minor changes	February 2024

## **1. Introduction and Statement**

- 1.1. Modern slavery is a crime and 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.
- 1.2. SAND Academies Trust has a zero-tolerance to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in SAND Academies Trust's own business or in any of its supply chains.
- 1.3. SAND Academies Trust are also committed to ensuring transparency in business and in approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. SAND Academies Trust expects the same high standards from all contractors, suppliers and other business partners.
- 1.4. This policy is being implemented to ensure that we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment 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.
- 1.5. In the case of employees, this policy applies to all persons working for SAND Academies Trust 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.
- 1.6. This statement does not form any part of any employee's contract of employment and may be amended at any time.

## **2. Responsibility**

- 2.1. The Board of Trustees has overall responsibility for ensuring this statement complies with SAND Academies Trust obligations and schools within the Trust are also required to comply with it.
- 2.2. The SAND Academies Trust schools have primary and day-to-day responsibility for implementing this statement, 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. Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it and the issue of modern slavery in supply chains and partners.

## **3. Compliance**

- 3.1. You must ensure that you read, understand and comply with this statement.
- 3.2. The prevention, detection and reporting of modern slavery in any part of SAND's business or supply chains is the responsibility of everyone. 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 as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of SAND's business 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 line manager or report it in accordance the 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 SAND or any tier of SAND's supply chains, constitutes any of the various forms of modern slavery, raise it with your line manager.
- 3.7. SAND 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. SAND 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 SAND's business or their 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, your should inform your line manager immediately. If the matter is not remedied immediately, and you are an employee of the trust, you should raise it formally using the Grievance Policy.

#### **4. Communication and awareness of this policy**

- 4.1. Information on this policy, and on the risk SAND faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work within the trust, and regular information will be provided as necessary.
- 4.2. SAND's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationships with them, and reinforced as appropriate thereafter.

#### **5. Breaches of this policy**

- 5.1. Any employee who breaches this policy will face disciplinary action, up to and including dismissal.
- 5.2. SAND Academies Trust may terminate business relationships with other individuals and organisations working on SAND's behalf if they breach this policy.