

Manor Hall Academy Trust



MODERN SLAVERY POLICY AND STATEMENT

Responsibility for monitoring and reviewing this policy lies with the Headteacher and LAB. A review of this policy and recommendations for change should be presented to the Directors of the trust for verifications.

The Directors of the trust, in line with the Scheme of Delegation and Articles of Association have overall responsibility for the effective operation of MAT policies, but has delegated day to day responsibility to the Headteacher and LAB.

Directors will take account of recommendations from individual schools in review of this policy and seek HR advice as to such revisions.

Date	Version	Change	Origin of Change	Changed by
Summer 23	1	New Policy	Chief Financial Officer	J Plant/ K Staples

Summer 24	2	Change to section 6 to provide reassurance to colleagues who report an incident	Standard review cycle	K Staples
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1. Introduction

Manor Hall Academy Trust is aware of the Modern Slavery Act 2015 which makes modern slavery illegal. We are therefore committed to ensuring that in all aspects of our Trust we have robust processes in place to demonstrate that we are taking all steps to ensure compliance in areas such as our suppliers, which is the main area where we could be exposed to aspects around modern slavery.

2. What is Modern Slavery?

Acts which may be classed as being “modern slavery” include:

- Slavery
- Servitude
- Human Trafficking
- Forced or compulsory labour

These acts have the effect of depriving a person of their liberty for personal or commercial gain.

Manor Hall Academy Trust is committed to ensuring that we safeguard all persons who may come into contact with the Trust either directly or indirect to ensure that their Human Rights are not in impinged and that they are not exploited.

Manor Hall Academy Trust performs due diligence on all suppliers, contractors or other third parties who perform services for our schools. This is to ensure that at the point that they are appointed we have made all reasonable enquiries to judge their suitability. We are however aware that circumstances can change for a variety of reasons and therefore we remain vigilant to ensure that we are doing all that we can to look out for or to spot signs of modern slavery.

3. What is Manor Hall Academy Trust and what is our ethos?

We are a collection of diverse schools who specialise in the following areas:

- Generic Special
- Social Emotional and Mental Health (“SEMH”)
- Pupil Referral Units/ Alternative Provision (“PRU/AP”)

Our schools offer education services from Early Year to Post 16 provisions. We operate in a collaborative and friendly manner so that best practice and ideas can be shared. Manor Hall Academy Trust is fully committed to our pupils and our ethos in that by building effective relationships we can celebrate success and promote the progress of our pupils. We work collaboratively to ensure the very best for our pupils so that they can lead fulfilled lives and achieve their ambitions.

Manor Hall Academy Trust also has a dedicated, highly trained and professional Central Team who support our Academy Schools in areas such as Finance, Business, Governance and Human Resources (“HR”). The Central Team shares the same ethos in that we collaborate and work well together to advance and support our schools.

The Central Team and the schools work closely together, forging strong and collaborative relationships.

4. What does the Modern Slavery Act 2015 cover?

The Modern Slavery Act 2015 came into force on 26 March 2015 and its aims are:

- To create a criminal offence of slavery, servitude, forced and compulsory labour and human trafficking
- To set out penalties and sentences for persons convicted of these offences
- To create prevention and risk orders as a way of dealing with incidences of modern slavery
- To create the role of the Independent Anti-Slavery Commissioner and the Gangmasters Licensing Authority
- To create further transparency in the supply chains etc
- To provide protection for all people including children who may be at risk of this practice.

Regulation 2 of The Modern Slavery Act (Transparency in Supply Chains) Regulations 2015 advises that organisations with a turnover of £36,000,000 should produce and publish a slavery and human trafficking statement each financial year. You can find the Manor Hall Academy statement for 2023-2024 appended to this policy as Appendix A. This statement will also be published on our website at www.manorhall.academy

5. How does Manor Hall ensure compliance with the Modern Slavery Act 2015

Manor Hall Academy Trust has a robust and consistent approach in dealing with areas where we are at the greatest risk of coming into contact with offences under the Modern Slavery Act 2015. A specific area that we have identified, where there is a greater risk is the area of our contractors, suppliers and other business partners. We therefore have a robust process of due diligence when taking on someone new, this due diligence includes:

- Completion of a standardised form, the form includes details of:
 - The company name and number
 - Address and other contact details
 - What specific service they will be providing for the Trust or school
 - Any other pertinent information
- We will then check the information against open source searches such as Companies House to ensure that the information is consistent and there are no anomalies
- We will create a central record and will review any further requests against this record
- We will refuse to use a company if we have concerns about the information that they supply, or if they cannot adequately address any queries that we have.

We perform these checks as we want to ensure that we are using firms who share our ethos and commitment in relation to the area of Modern Slavery. As our Modern Slavery statement has identified our greatest single risk to being in breach of the Modern Slavery Act 2015 is via our supply chains, we are committed to minimising any risk by these checks.

6. How will we respond to an incident of modern slavery

If an employee of Manor Hall Academy Trust suspects that there could be an incident of modern slavery, as listed at section 2, they should inform the Chief Operating Officer/Chief Financial Officer/Finance Manager immediately, or as soon as practically possible.

Upon receipt of the information, the Chief Operating Officer/Chief Financial Officer/Finance Manager will inform the Chief Executive Officer (or the Deputy Chief Executive Officer if

required). The Chief Executive Officer will then consider what further steps are required such as:

- Requiring further information to ensure that they are satisfied that it is a case of modern slavery or human trafficking
- If they are suitably convinced, to contact the Police and/or Gangmasters Licensing Authority. The Gangmasters Licensing Authority is a Government agency whose role is to protect vulnerable or exploited workers.

Manor Hall Academy Trust strongly encourages its staff to report any incident where they suspect that the practice of modern slavery is occurring. To supplement this commitment, we would like to assure colleagues that they would not face any consequence where they raise concerns in good faith but where we do not establish that there has been an incident of modern slavery. If colleagues were to face detriment treatment because they raised a concern in good faith, and they are employed by Manor Hall Academy Trust, they should use the Grievance Policy

7. What additional training is given to colleagues about Modern Slavery

In addition to the training that is provided concerning the due diligence checks for new suppliers at both Trust and school level. At the Trust level, new staff members are provided with detailed and useful training in relation to completing the due diligence steps. Our schools are advised not to enter into any agreements with any new suppliers until they have been approved by the Trust and have been added to our approved database.

Manor Hall Academy Trust also requires its employees at both the Central Team and in schools to complete the training module “Understanding Modern Slavery” which is listed on the National College platform. This training covers the following areas:

- What is the definition of modern slavery
- Modern slavery in today’s world
- Signs of modern slavery
- Victims and barriers to disclosure
- How to report modern slavery
- Legislation and offences
- Managing disclosures and reporting concerns
- Case studies – modern slavery examples

Colleagues are then asked to complete a test and if this is completed successfully they are awarded a certificate. Although it is recommended that all staff members complete this for their awareness, we would insist that anyone who has a direct relationship with suppliers or contractors to complete this training. This persons can include (not an exhaustive list):

- Headteachers/Executive Headteachers
- Other members of the Senior Leadership Team
- Bursars and Office Managers

8. Breaches of this policy

8.1 Employees of Manor Hall Academy Trust

Should an employee wilfully or deliberately act in a way which breaches this policy or any other safeguards in relation to the due diligence checks for suppliers they may be liable for disciplinary action under Manor Hall Academy Trust's Disciplinary Policy.

Should an employee be concerned that Manor Hall Academy Trust are not acting compliantly, they should raise this with their line manager. If this is not appropriate they should consult the whistleblowing policy.

8.2 Suppliers or contractor approved by Manor Hall Academy Trust

In addition to the actions listed under section 6 of this policy, Manor Hall Academy Trust will reserve the right to terminate the relationship where we find that there is a breach of the Modern Slavery Act. All suppliers and contractors will be made aware that we have this policy and the consequences for breaching this policy when they are approved.

9 Links to other policies

- Modern Slavery Statement
- Code of Conduct for Employees
- Disciplinary Policy
- Finance Policy
- Whistleblowing Policy
- Grievance Policy

Appendix A – Modern Slavery Statement

To also be displayed on our website – www.manorhall.academy

1. Manor Hall Academy Trust (“MHAT”)

This statement applies to Manor Hall Academy Trust (referred to in this statement as “MHAT”). The information included in the statement refers to the financial year 2023-2024.

2. MHAT’s structure

Our schools educate a diverse range of pupils from the ages of 2-19 years old. We have schools who specialise in Generic Special, Social, Emotional and Mental Health (“SEMH”) and Pupil Referral Units/ Alternative Provision (PRU/AP).

MHAT’s schools share a common ethos in which we aim to build good and effective working relationships to promote our pupil’s progress and then to celebrate their successes.

The Central Team provides support and guidance services in areas such as Finance, Business and Governance. The Central Team have defined processes for accepting new suppliers or other persons who provide services for our schools. Further information concerning this can be found in the Finance Policy.

3. Definitions

MHAT considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

4. Commitment

MHAT acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. MHAT understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its suppliers

MHAT does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the MHAT in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. MHAT strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England and Wales.

5. Potential exposure

MHAT considers its main exposure to the risk of slavery and human trafficking to exist within its suppliers including contractors who may be employed on an ad-hoc basis

In general, the MHAT considers its exposure to slavery/human trafficking to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

6. Steps

MHAT carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

MHAT has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the MHAT has taken the following steps to ensure that modern slavery is not taking place:

The above should include steps relating to:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Having a robust due diligence process for new suppliers before they are accepted as an agreed one for the MHAT.
- Monitoring areas such as estates ensure that the contractor is acting in line with this policy
- Regularly reporting to the Estates Committee where nominated Directors sit and minutes of the meeting are taken so that concerns and decisions can be recorded.

7. Policies

The MHAT has the following policies which further define its stance on modern slavery:

- Modern Slavery Policy
- Finance Policy
- Code of Conduct Policy

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.