



**THE HARMONY TRUST**

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## **Modern Slavery Policy**

### **June 2022**

<b>Description</b>	<b>By Whom</b>	<b>Date</b>
Established	AE	June 2022
Approved by Trustees		
Review Date	AE	June 2026



## **Modern Slavery Policy**

### **1. Policy statement**

- 1.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, Trustees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.2 This policy does not form part of any employee's contract of employment.
- 1.3 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.
- 1.4 We are 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.
- 1.5 We currently employ approximately 800 colleagues who are subject to pre-employment, right-to-work and the normal compliance checks prior to being employed by the Trust. We are committed to creating a work environment free of harassment and bullying, where everyone is treated with dignity and respect. As an organisation we have policies, standards and procedures in place, which fully support our efforts in ensuring that no slavery or human trafficking or human rights abuses occur in any of our Academies or within the Trust Central team:
  - **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
  - **Procurement Policy & Tender Documentation.** These documents outline the Trust's commitment to ensuring that its suppliers adhere to the highest standards of ethics.
  - **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
  - **Staff Code of Conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.



- **Equal Opportunities Policy.** This policy makes clear the Trust's commitment to equal opportunities, non-discriminatory procedures and practices.
- **Pay Policy.** This policy states that we aim to ensure that all pay bands are above the National Minimum Wage.
- **Health and Safety Policy.** This policy outlines the Trust's commitment to the management of health and safety.
- **Data protection Policy.** This policy states our commitment to the data protection principles and ensures we control how personal information is used responsibly within our organisation.

1.6 As a group of schools, we are also committed to raising awareness of modern slavery & human trafficking through our work with pupils / students, and to ensuring that our staff working in the family support / child protection field are equipped to deal with cases involving our pupils / students which may relate to human trafficking.

## 2. Responsibility for the policy

- 2.1 The Board of Trustees have 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 Assistant Director of Operations 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.
- 2.3 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. They should escalate any concerns through their Executive Principal/Principal to the Assistant Director of Operations.

## 3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 If you believe or suspect a breach of this policy has occurred or that it may occur (either within the Trust, or in the supply chain of any supplier) you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 3.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Assistant Director of Operations.
- 3.5 We aim 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. We are 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 our own business or in any of our 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, you should escalate this matter within your academy or, if this is not possible, to the Assistant Director of Operations.

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

- 4.1 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.
- 4.2 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.

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

- 5.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### **6. Equality Impact Assessment**

- 6.1 Under the Equality Act 2010 we have a duty not to discriminate against people based on their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.
- 6.2 This policy has been equality impact assessed and we believe it is in line with the Equality Act 2010 and it is fair, it does not prioritise or disadvantage any staff member or pupil and it helps to promote and encourage equality in our academies.

**7. Data Protection Statement**

- 7.1 The procedures and practice created by this policy have been reviewed in the light of our Data Protection Policy.
- 7.2 All data will be handled in accordance with the school's Data Protection Policy.

Data Audit For This Policy					
What?	Probable Content	Why?	Who?	Where?	When?
Modern Slavery policy	Any personal information including personal sensitive information	Required to be retained as part of Legal , statutory process	Principal / SLT, Trust central HR team, staff or other representative as required as part of the relevant process	Kept on HR file at academy (and Trust central where appropriate).	Held on file following relevant retention periods (dependent on nature of personal information)

As such, our assessment is that this policy:

Has Few / No Data Compliance Requirements	Has A Moderate Level of Data Compliance Requirements	Has a High Level Of Data Compliance Requirements
	✓	

**8. Review**

- 8.1 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Assistant Director of Operations via [tmellor01@theharmonytrust.org](mailto:tmellor01@theharmonytrust.org)
- 8.2 The Trust will review this policy every 4 years and/or if any significant changes in legislation occur. We reserve the right to amend this policy at any time.