

Anti Slavery & Human Trafficking Policy

Policy Type	
Adopted by	Trustees
Chair	Rev Nigel Sinclair
Date	07.02.2019
To be reviewed	2021
On Website	

This policy applies to all persons working for Elevate Multi Academy Trust ("Elevate") or on its behalf in any capacity, including employees at all levels, trustees, governors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment.

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.

Elevate has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all their business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

Elevate is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

Elevate expects the same high standards from all of its contractors, suppliers and other business partners and, as part of their 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, and expects that its suppliers will hold their own suppliers to the same high standards.

As a group of Academies, Elevate is also committed to raising awareness of modern slavery and human trafficking through its work with children, and ensuring that its staff who work in the family support and/or child protection field are equipped to deal with cases involving children which may relate to human trafficking.

Responsibility for the Policy

The Elevate trustees have overall responsibility for ensuring this policy complies with Elevate's legal and ethical obligations and that all those under their control comply with it.

Elevate's Compliance 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.

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 head teacher to the Compliance Officer.

Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of Elevate's business or supply chains is the responsibility of all those working for Elevate or under their control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur (either within Elevate or in the supply chain of any supplier) you must notify your manager or report it in accordance with Elevate's Whistleblowing Policy as soon as possible.

If you are unsure whether a particular act, the treatment of workers more generally or their working conditions within any tier of Elevate's supply chains constitutes any of the various forms of modern slavery, you must raise it with your manager or Elevate's Compliance Officer.

Elevate 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. Elevate 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 Elevate's own business or in any of its 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 Elevate's Compliance Officer

Communication and Awareness of this Policy

Training on this policy, and on the risk Elevate's business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Elevate, and regular training will be provided as necessary.

Elevate'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.

Breaches of this Policy

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

Elevate may terminate its relationship with other individuals and/or organisations working on Elevate's behalf if they breach this policy.

Review

Elevate will review this policy every four years and/or if any significant changes occur in legislation. Elevate reserves the right to amend this policy at any time.