

Modern Slavery Policy Statement

Anti-slavery and human trafficking policy

The Greenshaw Learning Trust is committed to preventing slavery and human trafficking in all corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This Greenshaw Learning Trust Policy applies to the Greenshaw Learning Trust as a whole and to all the schools and service units in the Trust, to their Trustees, governors, staff and volunteers, and to external contractors, consultants and suppliers.

This Statement is made by the Board of Trustees (the 'Board') of the Greenshaw Learning Trust pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our slavery and human trafficking statement for the financial year ending August 2019.

The Statement and Policy is the responsibility of the GLT Chief Executive Officer. It was approved by the Board of Trustees on 29 March 2019.

Organisational structure and supply chains

Greenshaw Learning Trust is an academy trust, a charitable company with the sole purpose of maintaining and developing academy schools, to provide comprehensive and inclusive education for the public benefit, funded by the Department for Education.

The Trust is responsible for primary and secondary schools in the south west London, Berkshire and Gloucestershire areas; it employs approximately 1,200 staff and has an annual turnover in excess of £55m.

The Trust recognises its responsibility to tackling modern slavery throughout its supply chains. The Trust's supply chains include the procurement of: uniform; catering, cleaning, caretaking and grounds maintenance services; furniture and equipment; ICT hardware; and construction.

Responsibilities

The Board of Trustees has overall responsibility for ensuring this policy statement complies with the Trust's legal and ethical obligations, and that all those under its control comply with it.

The Head of Finance and the Head of HR have primary and day-to-day operational responsibility for implementing this policy, and for monitoring and auditing internal control systems and procedures to ensure the policy is adhered to.

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

regarding modern slavery in supply chains.

Trustees, governors and staff involved in procurement are responsible for ensuring that this policy is complied with in the Trust's supply chains.

Relevant policies

The following Trust policies and procedures are directly related to and complement this Policy:

- **Whistleblowing Policy.**
- **Safeguarding Policy.**
- **Finance Policy**
- **Staff Code of Conduct.**

Compliance with the policy statement

The Board 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 the disclosure obligations under the Modern Slavery Act 2015, and to taking steps to understand potential modern slavery risks within its business, and to ensure that there is no slavery or human trafficking taking place in its business and its supply chains.

All Trustees and governors, members of staff and volunteers, external contractors, consultants and suppliers must read, understand and comply with this policy statement. They must:

- i. Avoid any activity that might lead to, or suggest, a breach of this policy.
- ii. Notify their manager or school Headteacher or GLT CEO as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- iii. Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- iv. If they believe or suspect a breach of this policy has occurred or may occur, notify their manager or school Headteacher or GLT CEO or report it in accordance with the GLT Whistleblowing Policy as soon as possible.

If there is any doubt about whether a particular act, the treatment of a person more generally, or their working conditions within the Trust or any tier of the Trust's supply chains may constitute any of the various forms of modern slavery, the matter should be raised with their line manager or school Headteacher or GLT CEO, or with the GLT Head of Finance or the GLT Head of HR.

Enhanced Due Diligence

The Trust has reviewed its current practice and as a result will:

- Require all members of staff to have completed training on modern slavery by [date] to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.

- Raise awareness of modern slavery issues by distributing flyers to all members of staff, volunteers, Trustees and governors, and by putting up posters across all GLT schools and service units. The flyers and posters will explain:
 - the basic principles of the Modern Slavery Act 2015;
 - how members of staff can identify and prevent slavery and human trafficking;
 - what members of staff can do to flag up potential slavery or human trafficking issues to the relevant people within the organisation; and
 - what external help is available, for example through the Modern Slavery Helpline.
- Review the Trust's procurement policies and procedures to ensure that they are able to identify the risk of slavery and human trafficking and ensure that there is no slavery and human trafficking in the Trust's business or supply chains
- Review the Trust's existing contracts and suppliers to ensure that slavery and human trafficking is not taking place in its supply chains
- Develop a system for supply chain verification that will ensure that potential suppliers are not allowing slavery or human trafficking are to take place
- Evaluate and monitor the effectiveness of the steps taken by the Trust to ensure slavery and human trafficking is not taking place in GLT schools, service units or supply chains.

This statement was approved by the Board of Trustees of Greenshaw Learning Trust on 29 March 2019.