



Policy:	Modern Slavery Policy
Date implemented:	
Date of review:	
Date of next review:	
Lead professional:	CEO
Status:	Statutory



# INDEX

1.0	Purpose of policy and guiding principles
2.0	Supply chain
3.0	Code of conduct

## 1.0 Purpose of policy and guiding principles

- 1.1 Polaris Multi Academy Trust has a zero tolerance approach to any form of modern slavery. Demonstrating integrity and ensuring any transactions are undertaken ethically, is key to living out our commitment of British values. This statement sets out our commitment to ongoing vigilance and our actions taken to date in terms of understanding the potential risks of modern slavery and ensuring our procedures provide assurances that there is no modern slavery or human trafficking in our own organisation and its supply chain. The Trust acknowledges its responsibility under the Modern Slavery Act 2015 (the Act) and will ensure transparency is achieved within the organisation so the objectives of the Act are achieved on a consistent basis.
- 1.2 We are committed to ensuring that no activities in which the Trust is engaged will cause harm to others. We will do all that is reasonably practicable to ensure that all employees in our supply chain are not subjected to any form of forced labour, compulsory/bonded labour or human trafficking and that they are paid the minimum wage.
- 1.3 All staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Trust Central Team taking responsibility for compliance. This statement and any supporting documentation will be reviewed annually. The following policies support the Trust's compliance with the Act:
- Recruitment
  - Equality Policy
  - Whistleblowing procedure

## 2.0 Supply chain

- 2.1 In line with our values and zero tolerance to slavery and human trafficking, the expectation is that all of our supply chain and contractors will subscribe to this. Our supply chain consists of the supply of services and goods to support the delivery of our services (such as IT and software, maintenance and facilities and equipment and materials). The vast majority of suppliers are UK businesses. Potential areas of risk include:
- Recruitment
  - Security Services
  - Food and Catering Services
  - Cleaning
  - Stationery and Office Equipment

When procuring goods, works and services, the Trust will ensure that suppliers are required to provide evidence of compliance with the Act during the selection process.

## 3.0 Code of conduct

The trust is committed to better understand its supply chain and working towards greater transparency and responsibility for people working on them. The Trust will require all new providers to sign up to the Trust code of conduct when invited to tender for contracts. The Code of Conduct states that:

- Suppliers must not use forced labour – slave, prison, indentured bonded or otherwise
- Suppliers must not traffic workers or in any other way exploit workers by means of threat, coercions, abduction or fraud
- Workers must be free to leave work and terminate their employment or other work status with reasonable notice
- Workers must be given clear, understandable contracts regarding the terms and conditions of their employment in a language understood by the worker
- Suppliers must not require workers to surrender government issued identification, passports or work permits as a condition of working
- Suppliers must ensure that their staffing and recruitment agencies comply with the requirements of the Modern Slavery Act 2015

3.1 The Trust will develop a preferred supplier list and put processes in place to ensure new suppliers are aware of our commitment to ensuring the risks of modern slavery and human trafficking entering our supply chain are eradicated.

3.2 The Trust is also committed to raising staff awareness of risks and issues around the modern slavery and human trafficking agenda. We will ensure that all order request forms used to process orders contain a statement about modern slavery and human trafficking. Staff accountable for the areas of risk highlighted in this policy will also receive communications outlining the issues and procedures for raising concerns.