



The Diocese of Westminster Academy Trust

'A Multi Academy Trust supporting schools in delivering their Mission to provide outstanding Catholic Education for their pupils'

The Diocese of Westminster Academy Trust Anti-Slavery and Human Trafficking Policy

The Diocese of Westminster Academy Trust is a multi academy trust ("Trust") and is also an exempt educational charity, subject to company law and is a not for profit organisation. The Trust is responsible for the leadership, governance and performance of Catholic secondary and primary schools within the Diocese of Westminster.

The Board of Trustees is the legal governing board of all academies within the Trust and is regulated by OFSTED and the Education and Skills Funding Agency for the exercise of its functions. Cardinal Vincent Nichols has identified tackling modern slavery as one of his key focuses and as a Trust within the Diocese of Westminster our Strategic Board and our Local Governing Boards have adopted a zero tolerance approach to modern slavery and we are committed to acting together as a Catholic educating community 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 organisations or in any of our supply chains.

The Trust has noted the requirements of the Modern Slavery Act 2015 (the "Act") and this statement is made on behalf of the Trust.

1. Policy statement

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 are confident that our policies promote good behaviour among our colleagues at work and within our Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust and of the staff, students/pupils and the communities it serves. Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act in the Trust are:

- Staff Code of Conduct
- Equality & Diversity Policy;
- Gifts, Hospitality & Related Party Policy;
- Safer Recruitment Policy;
- Whistleblowing Policy.



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We are also committed to ensuring there is transparency in our own organisation 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 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.

2. Responsibility for the policy

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Accounting Officer at the Strategic Board Level and Headteachers at each academy within the Trust have 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.

3. 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 our organisation 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.

The Academy's Headteacher must be informed as soon as possible if anyone believes or suspects that a conflict with this policy has occurred, or may occur in the future. The Headteacher will report any concerns to the Accounting Officer of the Trust. Concerns about non-compliance with this policy at Trust level (as opposed to Academy-level) must be raised directly with the Accounting Officer.

Concerns about any issue or suspicion of modern slavery in any parts of our organisation or supply chains of any supplier tier should be raised at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Headteacher at your Academy or report it in accordance



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with the Trust's Whistleblowing Policy as soon as possible.

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 the Headteacher at your academy .

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 inform the Headteacher at your Academy immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Trust's Grievance Procedure.

4. Communication and awareness of this policy

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

A copy of the policy is published on the Trust's website.

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

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. This policy does not form part of the employment contract of employees of the Diocese of Westminster Academy Trust.