

## **Introduction**

This policy statement is made by the Board of Trustees of the Greenshaw Learning Trust pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes the Trust's Modern Slavery Act Transparency Statement for the financial year ending August 2022.

It was approved by the Board of Trustees in April 2021.

The Statement is the responsibility of the GLT Chief Executive Officer.

This Statement 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. Where this statement refers to a Headteacher, this should be read as the Executive Head of Shared Services for the Trust Shared Service.

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.

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.

## **Organisational structure and supply chains**

The Greenshaw Learning Trust is an academy trust, a charitable company with the sole purpose of advancing education by 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 south London, Berkshire, Gloucestershire and the south west of England areas; it employs approximately 2,500 staff and has an annual turnover in excess of £100m.

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 statement complies with the Trust's legal and ethical obligations, and that all those under its control comply with it.

The Headteacher has primary and day-to-day operational responsibility for ensuring that this policy statement is complied with in respect to their school.

The GLT Head of Procurement has responsibility for implementing the policy and for monitoring and auditing internal control systems to ensure this statement 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:

- GLT Whistleblowing Policy.
- GLT Safeguarding Policy.
- GLT Finance & Procurement Policies.
- GLT Staff Code of Conduct.

### **Compliance with the policy statement**

The Board of Trustees 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 of the Greenshaw Learning Trust must read, understand and comply with this statement. They must:

- i. Avoid any activity that might lead to, or suggest, a breach of this statement.
- ii. Notify their Headteacher as soon as possible if they believe or suspect that a conflict with this statement 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 statement has occurred or may occur, notify their Headteacher or report it in accordance with the GLT Whistleblowing Policy as soon as possible;
- v. If the Headteacher believes or suspect a breach of this statement has occurred or may occur they must notify the GLT Head of Procurement.

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 the GLT Head of Procurement.

### **Enhanced Due Diligence**

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

- Require all members of staff with procurement responsibilities to complete training on modern slavery to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.
- Raise awareness of modern slavery issues with members of staff, volunteers, Trustees and governors by sharing information and appropriate training, including
  - 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 with 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 to ensure that potential suppliers are not allowing slavery or human trafficking 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.

**Anne Spackman Chair of the Board of Trustees**

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**Date** 8 April 2022

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