



St Joseph Catholic Multi Academy Trust

ANTI-SLAVERY POLICY

Presented & Approved by Trust Board	7th January 2022
Signed by Chair of Trust Board	<i>A. Connor</i>
Name of Chair of Trust Board	Ann Connor
Date	7th January 2022
Version	1
Date of Review	January 2025

Introduction

St Joseph Catholic Multi Academy Trust (hereafter referred to as “the Trust”) is committed to preventing slavery and human trafficking in its 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. We have a zero-tolerance approach to modern slavery and we are committed to acting 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 business or in any of our supply chains.

This policy sets out the steps the Trust is taking, 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.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

You are encouraged to 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. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Organisational structure and supply chains

The Trust has responsibility for a group of Catholic schools within the Archdiocese of Liverpool and Shrewsbury.

It was formed in 2021.

As the Trust is a charity, procurement of quality goods and services is an important part of ensuring charitable funds are carefully and correctly spent.

Supply chains utilised by the Trust currently include education, catering, caretaking cleaning, furniture and equipment, ICT hardware and maintenance.

The Trust will always consider which of its supply chains could be at a high risk of slavery or human trafficking.

Regard is given to supply chains which are high risk and which originate outside the UK. It identifies potentially high risk supply chains for schools such as catering, cleaning, furniture and uniform manufacture.

Responsibilities and Compliance

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chains, is the responsibility of all those working within the Trust or under the Trust's control.

All employees have an obligation to familiarise themselves with this policy to help in the identification and prevention of modern slavery and to conduct business in a manner that complies with our legal and ethical obligations and ensures that the opportunity for and incidence of modern slavery to occur is prevented.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and businesses in our supply chains. To underpin our compliance, we have implemented the following measures:

1. Conduct risk assessments to determine which parts of the organisations and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
2. Engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
3. Where appropriate, as informed by our risk assessment, use supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
4. Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Due diligence

As part of the Trust's initiative to identify and mitigate the risk of slavery and human trafficking in supply chains, the Trust will carry out stringent due diligence on new suppliers.

This includes:

- Obtaining general information on supplier companies and understanding their corporate structure.
- Assessing supplier financial stability by reviewing recent and previous company accounts.
- Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking.
- Ensuring suppliers are able to provide relevant health and safety checks.
- Ensuring suppliers on framework contracts are quality assurance compliant particularly in relation to working conditions and people.
- Obtaining details of supplier policies for the purchase of consumables.

Future steps and Key Performance Indicators

The Trust is committed to improving its practices to ensure that its business and supply chains are free from slavery and human trafficking.

The Trust will use appropriate key performance indicators to do this through:

- Enhanced due diligence, specific to slavery and human trafficking.
- Enhanced due diligence on existing suppliers, rather than on new suppliers only.
- Proactive engagement with high risk suppliers to obtain more detail on the entire supply chain.
- Staff training to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.
- Increased use of ethical suppliers.
- Maximised use of living wage pay rates across large contracts with a high proportion of staff costs.

Board approval

The Trust makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015.