



Anti-Slavery and Human Trafficking Guidance

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1. Introduction

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery takes various forms, such as slavery, servitude, human trafficking and forced labour, 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.
- 1.2 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 in our own business or in any of our supply chain and safeguarding any customers who may be at risk.
- 1.3 This guidance underpins our published Human Trafficking and Modern Statement.

2. Statement of Intent

- 2.1 This guidance will be applied to all staff working for or on behalf of the Trust in any capacity, including employees, directors, agency workers, volunteers and contractors (this list is not exhaustive).
- 2.2 All staff must ensure that they have read, understood and comply with this guidance.
- 2.3 This guidance does not form part of any employee's contract of employment.

3. Background

- 3.1 The Modern Slavery Act 2015 was introduced to specifically address slavery and trafficking in the 21st century.
- 3.2 The new legislation was introduced to significantly enhance support and protection for victims, gives law enforcement the tools they need to target today's slave drivers, ensures perpetrators can be severely punished, and includes a world leading provision to encourage business to take action to help ensure their end-to-end supply chains are slavery free.

4. Responding to modern slavery and trafficking

- 4.1 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for us. Employees are required to avoid any activity that might lead to, or suggest, a breach of this guidance.
- 4.2 The Trust aims to encourage openness and will support anyone who raises genuine concerns in good faith under this guidance, even if they turn out to be mistaken. The trust is committed to ensuring that 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 business or in any of our supply chains.

- 4.3 Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures must be followed whenever an employee suspects that someone is at risk. All employees receive 'Keeping Children Safe in Education' training which incorporates modern slavery. All employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our Safeguarding policies and procedures so that they are able to respond appropriately.

5. Breaches of this Guidance

- 5.1 All employees are expected to act in accordance with this guidance to minimise the risk of modern slavery and trafficking. Any member of staff found to be willfully neglectful in responding to concerns may face disciplinary action, which could lead to dismissal for misconduct or gross misconduct.

If any employee feels the Trust is not meeting our obligations under the Modern Slavery Act or is concerned that an individual is not meeting their obligations in relation to this guidance, in the first instance they should must notify their line manager in accordance with the Trust Whistleblowing guidance as soon as possible.

- 5.2 Beckfoot Trust reserve the right to terminate the contract/partnership where a supplier, contractor or external partner has been found to be in breach of the Modern Slavery Act.

6. Communication and awareness of this Guidance

- 6.1 Guidance awareness on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all staff. Existing staff received policy awareness when the guidance was launched.
- 6.2 Our zero-tolerance to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Review

- 7.1 This Anti-Slavery and Human Trafficking Guidance will be monitored through our Business Committee. It will also inform our statement of Slavery and Human Trafficking which will be published and presented to our Board on an annual basis.

Ends