

Human Trafficking and Modern Slavery Policy

Date of Policy Approval: September 2022

Owner of Policy: Chief Operating Officer

Authorised By: Executive Team

Policy Review Date: Autumn 2024

Distribution: **All Staff**
Members/Trustees/
Governors/Contractors

This is a Trust-Wide Policy
which applies to all the schools within the Trust

Human Trafficking and Modern Slavery Policy

Bright Futures Educational Trust's (Bright Futures or the Trust) Strategy underpins all aspects of this policy and the way in which it will be applied. These elements are:

- Our vision, the best **for** everyone, the best **from** everyone;
- All of our values; **Community**: We work together for a common purpose acknowledging diversity as strength. **Integrity**: We do the right things for the right reasons and **Passion**: We take responsibility, work hard and have high aspirations;
- Seven of our commitments: **Collaboration and strong relationships; Strong Governance and Accountability Professional learning; Effective communication; Supportive, challenging and fair and United behind decisions.**

What is the Policy for?

Modern slavery is a criminal offence under the Modern Slavery Act 2015 and encompasses 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.

This legislation requires businesses over a certain size (and Bright Futures fits this criterion) to publish annually what action they have taken to ensure there is no modern slavery in their business or suppliers. The Act also requires organisations to report on the processes and due diligence taken to ensure that their supply chains are slavery free.

This policy sets out Bright Futures' approach in relation to modern slavery and human trafficking with the aim of preventing opportunities for modern slavery to occur within its business or supply chain and safeguarding any customers who may be at risk.

This policy underpins our published Human Trafficking and Modern Slavery annual Statement [Statutory Reports - Bright Futures Educational Trust \(bright-futures.co.uk\)](https://www.bright-futures.co.uk)

Who is the Policy for?

This policy applies to all individuals working for or with Bright Futures in any form, including our supply chain, contractors, employees, local governors, trustees and all other business partners.

1. Bright Futures' approach to prevention

1.1. Our Trust comprises three secondary schools, seven primary schools, one High School which meets the diverse special educational needs of pupils between 11 and 19 and one primary special school which welcomes children with a wide range of learning difficulties. In addition the Development Network is part of Bright Futures and comprises of two Teaching School hubs (DfE-designated centres of excellence for teacher training and development); a commercial training centre for our schools and other partners and a school centred initial teacher training facility (SCITT) and a Maths Hub.

All components of our organisation share the same vision, values and commitments and **operate in accordance with Bright Futures' policies and procedures.**

1.2. Bright Futures actively works against all forms of modern slavery and trafficking.

We are committed to acting ethically, with integrity and transparency in all dealings and we expect our supply chain, contractors, employees, volunteers and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

1.3. We have a number of **related policies and strategies** which will support us in ensuring compliance with the Modern Slavery Act, they can be found on our website [Policies - Bright Futures Educational Trust \(bright-futures.co.uk\)](https://www.bright-futures.co.uk/policies). These include:

- Child Protection and Safeguarding Policy
- Safe and Fair Recruitment Policy
- Whistleblowing Policy
- Procurement Policy

We are therefore well placed to make a positive contribution to preventing opportunities for modern slavery to occur within our business and our supply chain.

2. Ensuring compliance with the Modern Slavery Act.

2.1 Procurement and supply chain. We are committed to ensuring that there is transparency in our operations and our approach to tackling modern slavery is consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other partners.

We accept that one of the biggest risks to our organisation of falling foul of the Modern Slavery Act is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the Act we will endeavour to eliminate the risks as much as possible.

We have a procurement function in our central operations team, with specialist resource and a robust Procurement policy and procedures. These include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards. We do this by ensuring that our procurement processes, and contractual terms include specific provision relating to the Modern Slavery Act. We also reserve the right to request suppliers to provide the full details of their supply chain as part of a procurement process and/or once a contract is in place.

2.2 Responding to modern slavery and trafficking within our supply chain. If a Bright Futures' employee suspects that modern slavery and/or trafficking may be occurring within our supply chain, in the first instance concerns should immediately be raised with the Procurement and Contracts Manager of the Trust: Procurement@bright-futures.co.uk. The Procurement and Contracts Manager should then: Immediately inform the Chief Operating Officer EVitalis@bright-futures.co.uk, who will then determine the appropriate action to take depending on circumstances/advice given by the authorities which may include one of the following:

- Call the police on 999 in an emergency and;
- Contact the Gangmasters Licensing Authority (GLA) on 0845 602 5020 or email: intelligence@gla.gsi.gov.uk .

When contacting the authorities the reporting manager will need to be clear about the circumstances and why it is considered that it is a case of modern slavery/human trafficking.

2.3 Education services. Many of our employees come into contact with members of the public. In doing so there is the possibility that they could encounter somebody believed to be at risk of modern slavery and/or trafficking. Whilst there is no typical victim, statistics show that risk is higher amongst the most vulnerable, ethnic minorities or socially-excluded groups. The member of staff should immediately report their concerns to the Principal/head or School, or in the case of a central services member of staff, to the Chief Operating officer: EVitalis@bright-futures.co.uk

2.4. Child Protection and Safeguarding. Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures must be followed whenever an employee or volunteer suspects that a child is at risk. The generic Trust wide 'Child Protection and Safeguarding Policy' [Policies - Bright Futures Educational Trust \(bright-futures.co.uk\)](#) is available on our website and each school has a bespoke version of this, available on the school website. There is a section in each of these policies that details human trafficking and modern slavery and provides referral information for the school's Designated Safeguarding Lead (DSL).

In addition all employees receive Safeguarding Children training which incorporates modern slavery. These 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. Line managers must ensure that safeguarding training is kept up to date. Safeguarding is everyone's responsibility.

2.5. Employment of Staff. Our Safe and Fair Recruitment policy [Policies - Bright Futures Educational Trust \(bright-futures.co.uk\)](#), is adhered to for all recruitment across the Trust. It details the pre-screening requirements for posts. The pre-screening methods relevant to modern slavery and human trafficking include, identification checks in accordance with government guidelines; employment references; right to work in the UK checks in accordance with government guidelines and disclosure and barring service (DBS) clearance.

3. Breaches of this policy

- All employees are expected to act in accordance with this policy to minimise the risk of modern slavery and trafficking. Any member of staff found to be wilfully neglectful in responding to concerns may face disciplinary action.
- Suppliers, contractors and external partners. In addition to reporting breaches to the appropriate authorities as outlined in section 2.2, Bright Futures reserves 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.
- If any employee feels Bright Futures is not meeting its obligations under the Modern Slavery Act, in the first instance they should raise the concern with their line manager, or Principal/Executive leader. If this is not appropriate, for example if the concern involves the line manager or

Principal, the whistleblowing policy details where referrals can be made: [Whistle-Blowing-Policy-Review-February-2021.pdf \(bright-futures.co.uk\)](#)

4. Further information and advice

Government: <https://www.gov.uk/government/collections/modern-slavery>

Modern Slavery website <https://www.modernslaveryhelpline.org/report>

Modern Slavery helpline 0800 0127 700