



GEP Modern Slavery Policy Statement

Responsible Committee:	GEP Resources
Responsible Officer:	Chief Operating Officer
Reviewed:	March 2019
Board approval date:	March 2019
Policy Type:	Statutory (when annual turnover \geq £36m)
Implementation date:	Immediate
	Adopted by all member academies (Local Academy Committee approval/ratification not required)
Publication:	External
Review cycle:	Annually
Next Review date:	Autumn 2019 (elected, not statutory)
Related documents:	GEP Finance Policy

General principles

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 take a zero-tolerance approach to modern slavery and ensure we act ethically and with integrity in all our business dealings and relationships. We are committed 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.

Our staff members 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 it is believed or suspected a breach of this Policy Statement has occurred or that it may occur staff are requested to notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If staff 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, they are asked to raise it with the finance team. 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.



We are also committed to ensuring there is transparency in our own business 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 our contractors, suppliers and other business 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.

This Statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This Policy however does not form part of any employee's contract of employment and we may amend it at any time.

This statement is reviewed at Trustee level, and the Central Finance Team and School Business Managers take day-to-day responsibility for ensuring this Statement is followed through in practice. The prevention, detection and reporting of modern slavery in any part of our delivery or supply chains is the responsibility of all those working for GEP Academies and/or contracted by GEP Academy schools, and staff members are required to avoid any activity that might lead to or suggest, a breach of this policy.

Training on this policy statement, and on the risk our operations faces from modern slavery in its supply chains, is available to individuals who work for us; update training can be provided as necessary. Our zero-tolerance approach to modern slavery is to be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy statement 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 statement.

Signature: Chief Executive Officer – Chris Tweedale	
Signature: Chair of Board of Directors – Fergal Roche	
Date: 29 March 2019	