

## **Modern-Day Slavery and Human Trafficking Policy**

Zems Academy is passionate about safeguarding our students. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm in our care, but also a moral duty. This policy and procedure focus on how we recruit and train our staff, support our students, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of violent extremism.

Throughout this policy and procedure, reference is made to modern day slavery and human trafficking. Modern Slavery Act became an act of parliament on 26th March 2015. The policy sets out to protect victims of human trafficking and slavery.

### **What is Modern Day Slavery?**

- Modern Day Slavery is anyone that works through violence and/or intimidation to work.
- Anyone that works for free to pay off a debt.
- Anyone forced to work against their will.

### **Common signs to look out for:**

- Changes in physical appearance.
- Is fearful, anxious, depressed, submissive, tense, or nervous/paranoid.
- Exhibits unusually fearful or anxious behaviour.
- Appear withdrawn.
- Avoids eye contact.
- Reluctant to seek help.
- Lacks health care/dental care.
- Appears malnourished.
- Shows signs of physical and/or sexual abuse, physical restraint, confinement, or torture  
Isolation
- Not allowed to travel on their own.
- Rarely interacts with others.
- Unfamiliar with their neighbourhood or where they work.
- Seem under the control of others.

### **Lack of control**

- Has few or no personal possessions.
- Is not in control of his/her own money, no financial records, or bank account.
- Is not in control of his/her own identification documents (ID or passport).
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating).
- May wear the same clothes day in day out or clothes be inappropriate for the work being done.  
Poor living condition.
- Dirty cramped environment.
- Over-crowded accommodation.
- Living and working at the same place.

## **Unusual travel times**

- Maybe dropped off and collected for work on a regular basis either very early or late at night.

Zems Academy Ltd wholly supports the Act and is committed to ensuring that our business is conducted in a professional and ethical manner. Zems academy Ltd will not tolerate the use of forced or child labour in any of its operations.

Zems Academy Ltd will not tolerate the physical punishment, abuse or involuntary servitude of any worker. Supply Chain Our attitude to modern slavery and human trafficking is zero tolerance and we expect all those in our supply chain to demonstrate their commitment and comply with our values.

## **Suppliers**

Any supplier found to be demonstrated unacceptable practices will be investigated and provided with guidance regarding immediate required improvements. If no improvement is implemented or they indicate an unwillingness to cease unacceptable practices they will be reported to the appropriate authorities and ultimately trading with this supplier would cease. Processes to Oppose Trafficking and Slavery We are committed to providing applicable staff with a salary, which at least meets the National Living Wage and offering the required statutory leave entitlement.

Furthermore, we ensure all our staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK. By checking our employees' NI numbers or Working Visa's we know they are legally eligible to work in the UK, and that their salary will be monitored by HMRC.

## **The Company**

The Company will not forge commercial relationships with any business knowingly involved with slavery or human trafficking. Compliance The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy. If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions with any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager or HR Manager or a Director.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The company is committed to ensuring no one suffers any detrimental treatment or victimization as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains. The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them. Breach of the policy. Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. The Company may terminate its commercial relationship with suppliers, contractors and other business partners if

If you suspect any person or persons is under the control of another, or spot any of the common signs,

Immediately contact:

Martin Grant

**[martin@zems.org.uk](mailto:martin@zems.org.uk)** or ring **0121 271 0420**

Alternatively, telephone:

National Modern Slavery Helpline on **0800 0121 700**.