



**BLACKBURNE
HOUSE**

Modern Slavery Policy

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Title of Policy	Modern Slavery Policy
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MODERN SLAVERY POLICY

POLICY STATEMENT

Modern slavery is a crime and violation of fundamental human rights, 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 to exploit them for personal or commercial gain. Blackburne House has a zero-tolerance approach toward modern slavery and we are committed to acting ethically and with integrity across all our business and in our external relationships. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or within any part of our external partnerships and stakeholder relationships.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout it. We expect the same high standards from all our contractors, suppliers and other business partners & stakeholders. 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 and we expect that partners and stakeholders to adopt the same values and principles.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels: directors, managers, teachers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time. This policy should be read alongside the Blackburne House Safeguarding Policy and Whistleblowing Policy.

RESPONSIBILITY FOR THE POLICY

The Procurement Department has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

The Group CEO has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training and this is also conveyed to new employees during their induction.

COMPLIANCE WITH THE POLICY

- It is your duty and responsibility to ensure that you read, understand and comply with this policy
- The prevention, detection and reporting of modern slavery in any part of our business or external work is the responsibility of all those working for Blackburne

House or under our control. You are required to avoid any activity or participate in any external partnership business that might lead to, or suggest, a breach of this policy

- You must notify your manager OR the Procurement Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future
- You are encouraged and expected to raise concerns about any issue of suspicion of modern slavery in any parts of our business or external partnership business of any such activity 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 or report it in accordance with our Whistleblowing Policy as soon as possible
- If you are unsure about whether a particular activity, the treatment of workers more generally, or their working conditions, within any of our external partnership business, constitutes any of the various forms of modern slavery, it is your duty to raise it with your manager or the Procurement Department.
- We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. 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 part of our external partnership business. If you believe that you have suffered any such treatment as a result of disclosing a concern, you should inform your line manager immediately

AWARENESS OF POLICY & COMMUNICATION

Training on this policy, and on the risk, our business faces from modern slavery in its supply chain will be given at induction and periodically where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and external business partners from the onset of our business relationship with them and reinforced as appropriate.

Reporting Instances of Modern Slavery

If you suspect someone is the victim of Modern Slavery, this should be raised with the Designated Safeguarding Lead or a Designated Safeguarding Officer. Cases involving children under the age of 18 must always be referred and a child welfare services form must be sent to the relevant local authority before referral. Referrals for Modern Slavery should be made through the Modern Slavery on 0800 0121 700 or [report it online](#). In the case of adults, an agreement is required to make a referral to the modern slavery helpline.

BREACHES OF THE MODERN SLAVERY POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.