



GREEN VALLEY ACADEMY

Modern Slavery Policy

Academic Board Approval, 5 October 2026

DOCUMENT CONTROL

Reference	GVA-18
Policy owner	Principal; student-facing concerns supported through the Wellbeing function; safeguarding concerns handled by the Designated Safeguarding Lead (DSL) under the Safeguarding and Prevent Policy
Approved by	Academic Board — 5 October 2026
Effective from	6 October 2026
Next review	August 2027, with a voluntary statement published annually
Applies to	All staff, contractors, suppliers and Academy activities, and to the protection of the Academy's students
Linked documents	Safeguarding and Prevent Policy; Whistleblowing Policy; Financial Conduct and AML Policy (Financial Conduct and Anti-Money Laundering Policy); procurement controls under the Fraud and Audit Assurance Policy

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1. PURPOSE AND COMMITMENT

- 1.1** Green Valley Academy is committed to ensuring that modern slavery in all its forms — slavery, servitude, forced or compulsory labour, debt bondage, human trafficking and exploitation — has no place in its own employment practices, no place in its supply chains, and no unnoticed presence among its students. Although the Academy's turnover falls below the threshold at which section 54 of the Modern Slavery Act 2015 requires a published transparency statement, the Academy adopts the Act's standards voluntarily and in full, for two reasons it regards as compelling: its students include adults whose circumstances — financial hardship, insecure work, dependence on others — are precisely those that traffickers and exploiters seek out; and an institution that educates public health practitioners, for whom exploitation is a determinant of health, ought to model in its own conduct the vigilance it teaches.

2. UNDERSTANDING MODERN SLAVERY

- 2.1** Modern slavery encompasses: forced or compulsory labour, being work or service exacted under the menace of any penalty and for which the person has not offered themselves freely; debt bondage, in which a person works to repay a debt whose terms are manipulated so that it can never fairly be discharged; human trafficking, being the arrangement or facilitation of another person's travel — internationally or within the United Kingdom — with a view to their exploitation; domestic servitude; and criminal exploitation, including the coerced participation of vulnerable people in illicit activity. Staff shall be trained to recognise the indicators they are most likely to encounter in an academic setting, including: a student whose identity documents are held by another person; wages or student finance paid into an account the student does not control; signs that another person controls the student's movements, communications or decisions, including an accompanying person who answers on their behalf; visible exhaustion, injury or fearfulness alongside excessive working hours; living arrangements involving many unrelated occupants at a single address; and third parties attempting to manage a student's enrolment, fees or refunds, which additionally engages the anti-money-laundering red flags of the Financial Conduct and Anti-Money Laundering Policy.

3. COMMITMENTS IN EMPLOYMENT AND SUPPLY CHAINS

- 3.1** In its own employment, the Academy commits that: every member of staff is engaged under a lawful written contract, with identity and right-to-work verification under the safer-recruitment controls of the Safeguarding and Prevent Policy; all pay meets or exceeds the applicable statutory minimum, and deductions are lawful and transparent; no worker is ever charged a fee for their own recruitment, whether by the Academy or by any agency acting for it, and any agency found charging such fees shall be removed from use; and every member of staff is free to leave their employment upon proper notice, no document retention, debt or threat ever qualifying that freedom. In its supply chains, the Academy commits that: every supplier of goods, services or labour shall confirm, as a condition of engagement, its compliance with the Modern Slavery Act 2015 and the absence of forced labour in its operations; and the Academy shall retain evidence of these confirmations, reviewed annually.

- 3.2** Contracts above the procurement threshold shall include an anti-slavery clause with a right of audit and a right of immediate termination for breach, and the sectors of recognized higher risk — cleaning, security, catering and construction — shall receive specific scrutiny at procurement and at renewal, including confirmation of the workforce's employment terms. The procurement threshold above which the **anti-slavery contractual clause and associated audit rights will apply is £10,000**. The Academy shall maintain a record of the assurances received, reviewed annually alongside the voluntary statement in Section 5.

4. PROTECTING STUDENTS AND RAISING CONCERNS

- 4.1** Concerns that a student may be experiencing exploitation are safeguarding matters and shall be handled exclusively under the Safeguarding and Prevent Policy: reported to the Designated Safeguarding Lead the same working day, triaged, and referred as appropriate, including — where modern slavery is indicated — into the National Referral Mechanism through an authorised first responder, with the police engaged wherever a person is in danger or a crime is in progress. Concerns about a member of staff, a supplier or any other aspect of the Academy's operations shall be reported to the principal, or through the Whistleblowing Policy, whose protections apply in full to every good-faith report under this policy. The Modern Slavery Helpline (08000 121 700) and, in emergencies, the police on 999, shall be publicised alongside the Academy's own routes, and no person shall ever be criticized or disadvantaged for raising a concern that proves unfounded.

5. RESPONSIBILITIES, REPORTING AND REVIEW

- 5.1** The Principal owns this policy, ensures that its supplier controls operate within the Academy's procurement practice, and reports annually to the Board of Directors on its operation, including the assurances obtained from suppliers, the training completed, and any concern raised and its outcome in anonymised form; the Designated Safeguarding Lead owns every student-facing concern under the Safeguarding and Prevent Policy; and all staff carry the duty to notice and report. The Academy shall publish a voluntary modern slavery statement on its website each year, approved by the Board, setting out the steps taken in the year to ensure that slavery and trafficking are not present in its business or supply chains; and this policy shall be reviewed annually, and immediately upon any incident or relevant change in law.