



Alleyne's School Policies & Procedures

Anti-Slavery and Human Trafficking Policy | Issue 1

Name of Policy	Anti-Trafficking and Human Trafficking
ISSR	N/A
Reviewed by	Chief Financial Officer
Author/SMT	Lara Akande Joseph (Clerk to the Governors and Legal Counsel)
Date of school review	N/A
Date of next school review	August 2026

APPLICABILITY

Entity	Applicable?
Alleyne's School	Y
Alleyne's Junior School	Y
Alleyne's Oakfield	Y
Alleyne's School Enterprises Limited	Y
Alleyne's School International Limited	Y
Edward Alleyne Club	Y

WHO WE ARE

We are Alleyne's School a company registered in England and Wales (the "School"). Our company registration number is 09401357, our charity registration number is 1161864 and our registered office is at Alleyne's School, Townley Road, London, SE22 8SU, United Kingdom.

This Policy covers Alleyne's School, comprising Alleyne's Junior School and Alleyne's Senior School, Alleyne's Oakfield, Alleyne's School Enterprises Ltd, Alleyne's School International Ltd and the Edward Alleyne Club (in this Policy, collectively referred to as 'the School').

POLICY STATEMENT

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. This Policy is made pursuant to the Modern Slavery Act 2015. Alleyne's School is committed to acting ethically and with integrity in all our operations, business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own organisation or in any of our supply chains.

We are also committed to ensuring there is transparency in our organisation and in our approach to tackling modern slavery throughout our operations and supply chains. We expect the same high standards from all of 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.

DEFINITIONS

Modern slavery is a crime and a violation of fundamental human rights. It includes:

- **Slavery:** Exercising powers of ownership over a person.
- **Servitude:** Coerced labour under obligation.
- **Forced or compulsory labour:** Work or service exacted from any person under threat or penalty.
- **Human trafficking:** The movement or recruitment of people by means such as threat, coercion, or deception for exploitation.

ABOUT THIS POLICY

- The purpose of this policy is to:
 - a. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - b. provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, 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.

RESPONSIBILITY FOR THE POLICY

- The Board of Governors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Senior Executive Group has primary and day-to-day 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 (where relevant to their role) are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

YOUR RESPONSIBILITIES AND HOW TO RAISE A CONCERN

- You must 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 supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify the Chief Financial Officer as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our operations or supply chains of any supplier tier at the earliest possible stage.
- If you believe or suspect that a breach of this policy has occurred or that it may occur you must inform the Chief Financial Officer as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our organisation or supply chains constitutes any of the various forms of modern slavery, raise it with the Chief Financial Officer.
- We aim 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. 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Financial Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedure.

SUPPLY CHAIN DUE DILIGENCE

The school will assess the risk of modern slavery in its supply chains, particularly in high-risk areas such as catering, uniforms, and construction. Suppliers are expected to comply with the Modern Slavery Act and may be required to provide their own modern slavery statements.

TRAINING AND COMMUNICATION

- Staff involved in procurement, recruitment, or management of third-party relationships will receive training to identify potential indicators of modern slavery.
- Our commitment to addressing the issue of modern slavery in our operations and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

BREACHES TO THIS POLICY

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals or organisations working on our behalf if they breach this policy.

MONITORING AND REVIEW

This policy will be reviewed annually by the Chief Financial Officer and approved by the Governing Body. The review will include an assessment of:

- Supplier due diligence;
- Staff training and awareness;
- Any incidents or concerns raised during the year.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Chief Financial Officer (Claire Morgan) using the following contact details morganc@alleyns.org.uk.

OCTOBER 2025

ENDS