KING EDWARD VI FOUNDATION BIRMINGHAM

Educational excellence for our City

KING EDWARD VI ACADEMY TRUST BIRMINGHAM

Modern Slavery Policy

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1. Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The King Edward VI Foundation and the Schools of King Edward VI Academy Trust (collectively referred to as the ''Foundation) is committed to understanding modern slavery risks and to acting ethically, transparently and with integrity in all of its business dealings and relationships. We will achieve this by implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking risks are minimalised within our schools and our supply chain, consistent with our obligations under the Modern Slavery Act 2015. The Foundation also expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it checks its supply chains for sign of modern slavery and considers the risk of modern slavery in its procurement practices.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Trust accepts that it has a responsibility through its due diligence processes to ensure that workers are safe and free from exploitation and that relevant employment, health and safety and human rights laws and standards are being adhered to

This policy applies to all individuals working for the Foundation or on the Foundation's behalf in any capacity.

2. Responsibility for the Policy

The Trustees have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Relevant department directors or heads of department have responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. The Head of Risk and Compliance is responsible for liaising with external audit who will provide an additional layer of review in relation to the Foundation's performance on preventing modern slavery.

A member of the management team will be responsible for investigating any allegations of modern slavery in the Foundation schools or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

3. Compliance

The prevention, detection and reporting of modern slavery in any part of the Foundation's schools or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Foundation

or under the Foundation's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect that a breach of, or conflict with this policy has occurred or may occur, you must notify your line manager or report it to a director. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Foundation's schools or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Foundation's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on **08000 121 700** for further information and guidance on modern slavery or report any concerns on Report modern slavery – GOV.UK - the modern slavery website.

The Foundation encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Adequate protection will be provided for whistle-blowers as assured in our Whistleblowing Policy. The Foundation is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the Foundation or in any of its supply chains.

4. Training and Communication

Regular training on this policy, and on the risk that the Foundation faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Trust's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

5. Identifying Slavery

There is no typical victim, and some victims may not realise that they are being exploited; everybody should be able to spot the signs that indicate that someone may be a victim of slavery or trafficking:

Physical Appearance

- Show signs of physical or psychological abuse, look malnourished or unkempt
- Repeated injuries
- Appear withdrawn

Isolation

- Rarely allowed to travel on their own, seem under the control of others or appear unfamiliar with their neighbourhood/ where they work
- Relationships that don't seem right, for example a younger teenager appearing to be the boyfriend/ girlfriend of a much older adult

- Gangs who live and travel together and don't interact with others

Poor living conditions

- Living in dirty, cramped or overcrowded accommodation
- Living and working at the same address, including living on site

Restricted Freedom of movement

- Little opportunity to move freely
- May be always accompanied
- Few or no personal affects (victims may have no identification documents, few personal possessions and wear the same clothes day in/ day out)
- The same address being given by a number of people, or one person looking after several people's documents or cards

Unusual travel times

- Dropped off/ collected for work on a regular basis possibly very early or late at night)
- Unusual travel arrangements – children being dropped off/ picked up in private cars/ taxi's at unusual times and places where it isn't clear why they would be there

Reluctant to ask for help

- Avoid eye contact, appear frightened or hesitant to talk to strangers
- Fear of police/ deportation/ violence

This list is not exhaustive, and a person is not necessarily a victim even if they display many of these signs, however suspicions should always be acted upon.

6. Supply Chains

The Trust understands that the potential for modern slavery exists within all of its supply chain, but considers the following areas as carrying a higher level of risk:

- IT Equipment supply
- Clothing and uniforms
- Outsourced cleaning
- Capital construction projects

- Outsourced security services
- Outsourced catering and hospitality

As part of its procurement and tender processes the Trust requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015, during any tendering and selection process, including through contracting with suppliers from approved procurement frameworks.

7. Breach

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Trust may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Appendix Modern Slavery Statement

Introduction

This statement is made on behalf of the King Edward VI Foundation and the Schools of King Edward VI Academy Trust (collectively referred to as the 'Foundation), pursuant to Section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ending 31st August 2022.

The Foundation understands that modern slavery is a growing issue, that it exists in every country and every type of economy; no industry or sector is safe from the risk. We strive to act ethically and with integrity in our business dealings and relationships to endeavour to ensure that there is no modern slavery within the Trust or its supply chain.

Organisation Structure

The Foundation is a registered charity (charity number 529051) comprised of two independent schools located in Birmingham. The Academy Trust is a limited company (company number 10654935).

The Foundation is a progressive, influential educational charity underpinned by a long and distinguished history, it has two independent schools - King Edward's School and King Edward VI High School for Girls. These schools are extremely successful schools, and the Foundation contributes significant funds each year towards free and assisted places for pupils from lower income families making the schools widely accessible irrespective of background.

The Academy Trust is a growing Multi-Academy Trust, in August 2022 it comprised of 11 academy schools located in Birmingham with another school joining the trust in the current financial year. Six of these schools are selective grammar schools, the remaining schools are all non-selective, some of them serve Birmingham's most deprived communities. The expansion into a wider diversity of local communities enables us to accelerate our strategies for improving the life chances of young people in Birmingham. This strategy embraces all our schools, independent and academies, selective and non-selective, opening doors for as many students as we can and striving to make Birmingham the best place to be educated in Britain.

Supply Chain

Our supply chain is predominantly UK based and is comprised of material supplies, facilities management, IT services and goods, legal services, financial services, catering, agency staff and cleaning services.

The Foundation expects its suppliers to comply with all local and national laws and regulations and suppliers are made aware of our high standards. We are working towards awarding contracts via frameworks which meet the requirements of the Modern Slavery Act 2015. We have a procurement function based at Head Office, in addition to working directly with the supply chain, they support the procurement function at a local level within schools and provide a level of knowledge and oversight in relation to preventing modern slavery.

Policies

The Trust has a legal and moral duty to protect workers within the Trust or its supply chain and we have a suite of policies that mitigate the risk and contribute to our ability to fulfil this duty. Our key policies in relation to this are:

- Safer Recruitment Policy
- Risk Management Policy
- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Code of Conduct
- Procurement Policy
- Fraud Policy
- Supplier Terms and Conditions

Due Diligence and Risk Assessment

We have identified our main risks from modern slavery as child sex exploitation or human trafficking, and our supply chain. To counteract these risks, in addition to our policies and procedures, we have specific Designated Safeguarding Leaders (DSL) in every school who lead on the implementation of policy and practice embedding a culture of safeguarding in everything we do. DSL's are experienced and model excellent practise for all staff. Through their encouragement, each school proactively works with the local authorities, the LADO and local stakeholders to combat all safeguarding issues, including child sex exploitation and human trafficking. Best practice is shared throughout the trust.

Statutory safeguarding practices and their impact on keeping children safe are audited via peer review, through the work of our internal auditors and by specialist external consultants commissioned to undertake a review of our safeguarding practices on a regular basis.
Safeguarding is an agenda item at every School Governing Body, the Academy Trust Curriculum Standards and Welfare Committee and is reported to the Trust Boards termly.

Procurement is subject to internal audit and external review. We will not work with suppliers who are unwilling to confirm compliance with the Modern Slavery Act.

We aim to reduce the risk of modern slavery by:

- Understanding that Modern Slavery risks continue to evolve and ensuring we are informed by staying abreast of guidance and information available.
- Communicating our modern slavery policy to all staff and suppliers.
- Using training to ensure staff are aware of what modern slavery looks like and remain vigilant to it.
- Requesting suppliers to provide evidence of their own policies and compliance as appropriate.

Training

All new staff are trained in our policy and processes as part of their induction, existing staff are given annual refresher training and any updates to policy and procedures are communicated as they occur.

Through our training and communication, we enable employees to understand what modern slavery in and outside of our workplace looks like, encourage ethical choices and acting on concerns.

Measuring Effectiveness

We have not identified any modern slavery or human trafficking with the financial year that this statement relates to. Whilst our current policies and processes are felt to be effective, we will not be complacent and will continue to monitor and review.

Signature

This statement covers the period 1st September 2021 to 31st August 2022. It was approved by the Board on 25th January 2023 and signed by the Finance Director on behalf of the Board on the same day.

Name & Position: Greg Langston
Date: 25th January 2023