



PASS 11 PLUS
GRAMMAR PREPARATION SUCCESS

Modern Slavery Policy

Responsible Board/Committee	Pass11 Plus Grammar Success
Policy Type	Central Policy (Group A)
Policy Owner	Pass11 Plus Grammar Success
Statutory	Yes
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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. Pass11 Plus Grammar Success is committed to understanding modern slavery risks and to acting ethically, transparently and with integrity in all 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. Pass11 Plus 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 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. Pass11 Plus accepts that it has a responsibility 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, ensuring that these standards are upheld through its due diligence processes.

This policy applies to all individuals working for Pass11 Plus's behalf in any capacity.

Responsibility for the Policy

Pass11 Plus has 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, as well as auditing internal control systems and policies and procedures to ensure they are effective in preventing or mitigating the risk of modern slavery and providing effective remedy where issues may be found. Pass11 Plus is responsible for liaising with external auditors, who will provide an additional layer of review in relation to the Foundation's performance on preventing modern slavery.

Pass11 Plus 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.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of the Pass11 Plus's school, whether in the UK or abroad, is the responsibility of all those working for it. 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 Pass11 Plus's centre. If you are unsure about whether a particular act, the treatment of workers or their working conditions 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](https://www.gov.uk/report-modern-slavery) - the modern slavery website.

Pass11 Plus Grammar Success 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. Pass11 Plus 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 Pass11 Plus's centre. 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 Foundation.

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 Pass11 Plus's Boards termly.

Training and Communication

Regular training on this policy, and on the risk that Pass11 Plus 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.

Pass11 Plus'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.

1. Supply Chains

Pass11 Plus Grammar Success understands that the potential for modern slavery exists within all 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 Pass11 Plus 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.

2. Breach

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

Pass11 Plus Grammar Success 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 Pass11 Plus Grammar Success, pursuant to Section 54, Transparency in Supply Chains (1) of the Modern Slavery Act 2015 and relates to the **financial year ending 31st August 2022**.

Pass11 Plus 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 Foundation or its supply chain.

Organisation Structure

Pass11 Plus is a registered charity (charity number 529051) comprised of two independent schools located in Birmingham.

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, as of January 2024, it comprises of 12 academy schools located in Birmingham. 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. Work is undertaken to identify higher risk goods and services, for example, IT equipment and contingency labour. We use a series of key characteristics (such as sourcing geography, industry type, nature of work and supply chain model) to identify the risk of modern slavery to the relevant contract so we can seek to ensure that the subsequent procurement and contract management activity is proportionate.

Pass11 Plus expects its suppliers to comply with all local and national laws and regulations and suppliers are made aware of our high standards. We are endeavouring to award contracts via public sector 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

Pass11 Plus has a legal and moral duty to protect it's workers 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:

- o Safer Recruitment Policy
- o Risk Management Policy
- o Safeguarding and Child Protection Policy
- o Whistleblowing Policy
- o Code of Conduct
- o Procurement Policy
- o Fraud Policy
- o 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, 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:

- o Identifying higher risk goods and services, for example, IT equipment and contingency labour. We use a series of key characteristics (such as sourcing geography, industry type, nature of work and supply chain model) to identify the risk of modern slavery to the relevant contract so we can seek to ensure that the subsequent procurement and contract management activity is proportionate.
- o Understanding that Modern Slavery risks continue to evolve and ensuring we are informed by staying abreast of guidance and information available.
- o Communicating our modern slavery policy to all staff and suppliers.
- o Using training to ensure staff are aware of what modern slavery looks like and remain vigilant to it.
- o 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 30st September 2021 to 31st August 2022. It was approved by the Board on 25th January 2023 and signed by the Director of Finance on behalf of the Board on the same day.

**Name &
Position:**

Greg Langston

Date:

**25th January
2023**