

# Modern Slavery and Human Trafficking Statement

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Signed by CEO and Accounting Officer for PACT  
Approved by Trust Board – October 2023

The Prince Albert Community Trust

## Modern Slavery and Human Trafficking Statement 2022-2023

### Background

This statement is made on behalf of The PA Community Trust (PACT) (company number 09718257) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. PACT's financial year is September to August. This statement covers the financial and academic year 2022-23.

PACT recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.

This statement sets out PACT's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

### Structure, business, and supply chains

PACT is a multi-academy trust (MAT), working within some of the most economically deprived areas of the city of Birmingham. The list of our academies can be found on our PACT website.

PACT has two main areas of operations:

- A Trust level which oversees the business as a whole;
- A local level – e.g., an individual school.

Our suppliers are UK based and key supply areas cover catering, maintenance/repairs, agency staff and cleaning.

### Our approach

We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all of our charitable and business relations.

### Policies, documentation, and key relationships

The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Procurement Policy;
- Complaints Policy;
- Whistleblowing Policy and Procedure;
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy;
- Safeguarding and Child Protection Policy;
- Code of Conduct;
- Supplier terms and conditions.

Our Finance, Resource and Audit Committee (FRAC) has overall oversight of the process and practices embedded within PACT to reduce Modern Slavery and in ensuring our supply chains, which rely on people, can demonstrate adherence with local and national laws and regulations, including paying the minimum wage.

### Identifying and addressing risks

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact PACT. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

### Supply chain

PACT's procurement regulations set out the requirements we have in relation to our engagement with suppliers. Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS (Disclosure & Barring Service) check. We publish our standard terms and conditions to ensure providers looking to contract with us are aware of our standards. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are being considered for all tenders and these meet the requirements of the Modern

Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders go through Director of Finance at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

We have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act. No areas of risk were identified. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking, and fully understand our duty as a Trust as prescribed in legislation namely in the form of e-learning. Safeguarding colleagues also cover modern slavery within their CPD programme.

## **Safeguarding**

We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Director of Safeguarding and Welfare, together with a Strategic Business Lead for Safeguarding as well as Designated Safeguarding Leads in every school. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are incredibly experienced in this area and model excellent practice for all staff. Through their encouragement, each school proactively works with the local authorities, the local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared amongst the schools and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

PACT have a named Trustee with portfolio responsibility for safeguarding. This Trustee is also the Chair of the Welfare and Safeguarding Committee (WASC) which meets once a term. The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice is reviewed at every Quality Assurance Review Day in our schools. In addition, the Chief Executive Officer meets at least every fortnight with the Director of Safeguarding.

Our PACT Safeguarding and Child Protection Policy is reviewed annually by the Executive Leadership Team and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education.

## **Key performance indicators to measure effectiveness of steps being taken**

### **Training**

Every member of staff, whether or not they are based in a school, is trained on the policy (either in person or via e-learning) and is required to declare annually that they have read and understood the policy and their training. In addition, PACT also has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of disciplinary action.

Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus upon early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk pupils, staff, and contractors.

This is not an area for complacency however and we keep under closely scrutiny and evaluation our safeguarding policy and practice. This enables us to refine and develop excellence in all we do and in this Modern Slavery Statement for 2022 – 2023 we recognise the impact of the pandemic is not to be underestimated as we continually enhance the knowledge of our staff to prevent slavery and human trafficking and child sexual exploitation. Safeguarding awareness sessions for modern slavery (and trafficking) at school level are included within our staff safeguarding CPD plan.

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our estates.

### **Reporting**

To date, no referrals have been made in relation to modern slavery. Since the date of issue of our inaugural Modern Slavery and Human Trafficking Statement approved by the Board of Trustees in the academic year 2022-23, there have been no referrals made for child sexual exploitation.

**This statement has been approved by the PA Community Trust Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015**