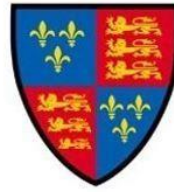




**KING EDWARD VI
FOUNDATION
BIRMINGHAM**

Educational excellence for our City



**KING EDWARD VI
ACADEMY TRUST
BIRMINGHAM**

Modern Slavery Policy

Responsible Board/Committee	Academy Trust Board and Foundation Board
Policy Type	Central Policy (Group A)
Policy Owner	Risk & Compliance & Procurement
Statutory	Yes
Publish Online	Yes
Last Review Date	December 2025
Review Cycle	Annual This policy will not expire but will be reviewed as per its designated cycle. This policy remains effective whilst the review is taking place and will only become non-applicable once the updated version has been approved.
Next Review Date	December 2026
Version	4

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Purpose

Modern slavery is a crime that results in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, including slavery, servitude, forced or compulsory labour, and human trafficking. The King Edward VI Academy Trust and The Schools of King Edward VI in Birmingham (collectively known as “The Foundation”) are committed to understanding the risks associated with modern slavery and to acting ethically, transparently, and with integrity in all business dealings and relationships. This policy outlines how we will achieve this by implementing and enforcing effective systems and controls to ensure that the risks of modern slavery and human trafficking are minimised within our schools and our supply chain, in accordance with our obligations under the Modern Slavery Act 2015. This policy applies to all individuals working for The Foundation or on the Foundation’s behalf in any capacity.

Roles and Responsibilities

The Governors and Trustees have overall responsibility for ensuring that this policy complies with legal and ethical obligations.

Relevant department directors or heads of department are responsible for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems, policies, and procedures to ensure they effectively prevent or mitigate the risk of modern slavery and provide effective remedies where issues may be identified.

The Director of Strategic Management, the Chief Finance Officer, and relevant colleagues will be responsible for investigating any allegations of modern slavery in the Foundation schools or supply chains.

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

Procedures

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

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

1. Supply Chains

The Foundation understands that the potential for modern slavery exists within all its supply chains 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 Foundation requires all potential third-party suppliers to provide evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015. This requirement applies throughout the tendering and selection process, including when contracting with suppliers from approved procurement frameworks.

2. Breaches

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

The Foundation 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.

Compliance and Monitoring

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 or its supply chains as soon as possible. If you are unsure 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.

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 that 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.

In addition to our policies and procedures, we have specific Designated Safeguarding Leaders (DSLs) in every school who lead the implementation of policy and practice, embedding a culture of safeguarding in everything we do. DSLs are experienced and model excellent practice for all staff. Each school proactively works with the Local Authority Designated Officer and local stakeholders to combat all safeguarding issues, including child sexual exploitation and human trafficking. Best practice is shared throughout The Foundation. Our safeguarding practices are regularly audited. For further details, see the Safeguarding and Child Protection policy.

References, legislation, and guidance

This policy is based on the Modern Slavery Act 2015:
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

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, Transparency in Supply Chains (1) of the Modern Slavery Act 2015, and relates to the financial year ending 31st August 2025.

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

Organisation Structure

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

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

The Academy Trust is a growing Multi-Academy Trust. As of January 2024, it comprises 12 academy schools located in Birmingham. Six of these schools are selective grammar schools, while the remaining schools are non-selective, with some serving 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 encompasses 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 comprises material supplies, facilities management, IT services and goods, legal services, financial services, catering, agency staff, and cleaning services. We undertake work to identify higher-risk goods and services, such as IT equipment and contingency labour. We use a series of key characteristics (including sourcing geography, industry type, nature of work, and supply chain model) to assess the risk

of modern slavery associated with each relevant contract, ensuring that subsequent procurement and contract management activities are proportionate.

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 striving to award contracts through public sector frameworks that 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, this function supports procurement activities at a local level within schools and provides knowledge and oversight related to preventing modern slavery.

Policies

The Foundation has a legal and moral duty to protect workers within the Foundation and its supply chain. We have a suite of policies that mitigate risks 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
- Whistleblowing Policy
- Code of Conduct
- Procurement Policy
- Anti-fraud Policy
- Supplier Terms and Conditions

Due Diligence and Risk Assessment

We have identified our main risks related to modern slavery as child sex exploitation, human trafficking, and issues within our supply chain. To counteract these risks, Procurement is subject to both internal audits and external reviews. We will not work with suppliers who are unwilling to confirm their compliance with the Modern Slavery Act.

We aim to reduce the risk of modern slavery by:

- Identifying higher-risk goods and services, such as 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 assess the risk of modern slavery associated with the relevant contract, allowing us to ensure that the subsequent procurement and contract management activity is proportionate.
- Understanding that Modern Slavery risks continue to evolve and ensuring we remain informed by staying abreast of guidance and information available.
- Communicating our modern slavery policy to all staff and suppliers.
- Providing 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 relevant new staff are trained in our policies and processes as part of their induction. Existing staff receive biennial refresher training, and any updates to policies and procedures are communicated as they occur.

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

Measuring Effectiveness

We have not identified any instances of modern slavery or human trafficking for the financial year to which this statement relates. While we believe our current policies and processes are effective, we will not be complacent and will continue to monitor and review them.

Signature

This statement covers the period from 1st September 2024 to 31st August 2025. It was approved by the Academy Trust Board and Foundation Board on 10th December 2025 and signed by the Chief Finance Officer on behalf of both boards on the same day.

Name and position: Greg Langston, Chief Finance Officer

Signature:

G Langston

Date: 10th December 2025