

# Modern Slavery Statement

EPAT

Believe Succeed Together

Date Reviewed	August 24
Date Ratified by the Trust	September 2024

This statement is made on behalf of the EPAT Trust ) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

EPAT 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 EPAT'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**

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 and Contracts Policy;

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

Our Finance, Audit & Risk Committee has overall oversight of the process and practices embedded within EPAT 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. The members of the Committee work together with the Personnel Committee as appropriate on these areas.

### **Identifying and addressing risks**

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact EPAT. 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**

EPAT'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 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 Head of Procurement at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

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**

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 Trust SG Lead, a link SG Trustee as well as Designated Safeguarding Leads in every academy. 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 academy 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 academies and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Statutory safeguarding practices and impact on keeping children safe are formally reviewed.

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

### **Training**

Every member of staff, whether or not they are based in an academy, 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, EPAT 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.

Annual safeguarding training includes a detailed focus upon on 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 2024 – 2025 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 academy 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.