



**Bosco Catholic Education Trust**

**Modern Slavery Statement  
for the Academic Year  
ending 31<sup>st</sup> August 2022**

**This statement was reviewed and approved by the  
Bosco Catholic Education Trust Board  
on Friday 10<sup>th</sup> February 2023**

## **1. INTRODUCTION**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers and can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Bosco Catholic Education Trust ("the Trust") is committed to the highest standards of ethical conduct. This includes a commitment to prevent and eliminate any form of modern slavery and/or human trafficking in its business activities and its supply chain.

This statement sets out the steps the Trust has taken, during the academic year ending 31st August 2022 to address the risk of modern slavery within our business activities and the steps the Trust will take, to combat modern slavery and human trafficking to address the requirements of the Modern Slavery Act (2015),

## **2. OUR ORGANISATIONAL STRUCTURE**

Bosco Catholic Education Trust is a Catholic Multi-Academy Trust founded in 2017 under the Diocese of Arundel & Brighton and brings together 5 schools (3 Primary & 2 Secondary) across Sussex.

The Trust is committed to providing the very best Catholic education and aims for its pupils and students to be happy, safe and inspired to flourish spiritually, socially and academically.

## **3. COUNTRIES OF OPERATION**

The Trust operates within England and our contractors and suppliers are predominantly UK based.

## **4. RISK MANAGEMENT**

Risk management is embedded in the day-to-day practice within the Bosco Catholic Education Trust. Potential risks have been identified and documented and are reviewed regularly by the CEO, Finance, Audit & Risk Committee and the Trust Board as a whole to ensure continuous compliance and improvement. The Trust is committed to ensuring the safety of pupils, students and employees and has in place appropriate strategies, policies and procedure to help mitigate against risk.

We are confident that, by working together with our suppliers, we can aim to ensure that they adhere to the same high standards in the prevention of slavery and human trafficking.

## **5. OUR SUPPLY CHAINS**

The Trust's supply chain includes suppliers of educational materials, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware, construction, consultancies and recruitment agencies.

The Trust works predominately with UK based suppliers and contractors whose employees are protected under UK employment law. Although the Trust does not conduct business in countries where there is active human trafficking and / or modern slavery, the Trust is aware of the need to ensure that companies within our supply chain share our commitment to treat their employees in a fair and ethical way.

We continue to purchase goods, services, and works in accordance with the Academies Trust Handbook, which ensures compliance with current legislation and procurement best practice.

## **6. TRUST POLICIES**

The trust has the following policies which demonstrate a commitment to promoting anti- slavery and preventing human trafficking violations:

[Finance Manual / Finance & Investment Policy](#)

Providing a framework of governance and steps to ensure all procurement activity is compliant to legislation and best practice including transparency of our supply base.

### Child Protection Policy and Safeguarding

The aim is to provide a safe and secure environment for Children and providing a framework of our Schools to identify and support students who are at risk of modern slavery, trafficking or exploitation. This legal requirement together with the Catholic values and principles that underpin Bosco Catholic Education Trust mean that it is essential that the Trust ensures not only compliance at local level but also assumes a strategic responsibility to ensure that safeguarding practices are robust and effective in safeguarding and protecting the welfare of all children and young people in its care.

The Trust Board leads on safeguarding within the Trust. All schools have a Designated Safeguarding Lead and a Safeguarding Governor. Safeguarding is reported on at every Trust Board Meeting and at every Local Governing Committee meeting.

Child Protection & Safeguarding policies are based on the Department for Education publication "Keeping Children Safe in Education" and all employees are required to have read and understood this document as well as to undertake annual Safeguarding refresher training.

### Whistleblowing Policy

This policy provides a mechanism for encouraging employees to report concerns about potential wrongdoings, including modern slavery risks, without fear of reprisal, victimisation, or subsequent discrimination. It is intended to encourage and enable employees to raise serious concerns within the Trust. It is recognised that cases may have to proceed on a confidential basis.

## **7. CULTURE AND TRAINING**

We are committed to promoting a culture of awareness amongst staff and stakeholders by means of regular communication via Heads & Chairs meetings, Trust-wide inset and termly newsletters to relay any significant changes to key legislation.

We adhere to safer recruitment requirements in line with the Keeping Children Safe in Education statutory guidance.

## **8. ACTIONS TAKEN THIS ACADEMIC YEAR**

Review and implementation of the Trust-wide Employee Code of Conduct policy and procedure.

Annual refresher training as an integral part of the statutory safeguarding and prevent training that is required of all staff.

Ongoing Activities:

- Implementation of a Tender Process to support the bringing in of new suppliers to our supply chain.
- Centralisation of Finance and HR Services allowing data to be retained, monitored and accessed centrally.
- Trust-wide Risk Register in place, reviewed regularly by the Trust Board and Finance, Audit & Risk Committee.
- Centralised procurement of high-risk contracts to limit risk and exposure to suppliers and contractors operating outside of this policy.
- As part of our recruitment processes, safer recruitment procedures are in place.

## **9. NEXT STEPS**

To continue raising awareness across the organisation via internal communication channels, sharing a full copy of the Modern Slavery Act on the Trust website and ensuring it is accessible to all Designated Safeguarding Leads, Senior Leaders and the Trust Board.