

# Modern slavery and human trafficking statement

2021

## Introduction

This statement constitutes the modern slavery and human trafficking transparency statement for the Diverse Academies Trust and is designed to satisfy the requirements of Section 54 of the Modern Slavery Act 2015. This statement relates to actions and activities between 1 September 2020 and 31 August 2021 (the 2020/21 academic year). It will be reviewed on an annual basis in line with our organisation's financial year, which runs September to August.

We remain committed to the highest standards and the continuous improvement of ethical conduct in all our activities. This is the organisation's fourth annual modern slavery statement. Whilst it focuses on the work, progress and impact that has taken place over the past year, it also reflects the organisation's ongoing response to increased risks identified because of the Covid-19 pandemic. It also sets out the planned activity to improve our processes going forward and ensure that we are taking a proactive approach to the prevention of modern slavery.

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## Our organisational structures



Diverse Academies is a multi-academy trust comprising six secondary, six primary (the most recent joining the Trust in December 2020) and two special academies. We also have a shared sixth form centre facility in Hucknall, which is managed in partnership with the National Church of England Academy.

Diverse Academies Trust is a company limited by guarantee and an exempt charity. The Trust operates in the education sector across Nottinghamshire and Lincolnshire, delivering teaching and learning to children and young people. It also works in conjunction with Diverse Association for Professional Learning to deliver initial teacher training and CPD (continued professional development) programmes.

We have approximately 7,800 pupils and students and over 1,100 employees (data as of 31 August 2021). All staff within our organisation report to the chief executive team, chaired by the chief executive officer, who in turn reports to the Trust Board.

## Risk management and assessment



Our safeguarding policy and practice are audited on an annual basis and assesses if any safeguarding practices represent a risk to our organisation's compliance within the relevant legislation. During the academic year, Diverse Academies continued to respond to the Covid-19 pandemic with appendices to

many policies including safeguarding and child protection.

Academy risk registers, which include all statutory areas of risk, are regularly updated, and reviewed at both academy and Trust level. They are audited on an annual basis with the organisational overview presented to the Audit and Risk Committee and the Trust Board.

### Progress and impact

- Reference to modern slavery has been incorporated into the safeguarding audits in academies to ensure that the culture and knowledge has been embedded.
- Refresher training has been delivered to all staff on modern slavery, within the context of Child Criminal Exploitation, Child Sexual Exploitation and Human Trafficking as well as being an integral part of the statutory safeguarding and prevent training that is required of all staff.
- Identified areas of gaps in knowledge continued to be addressed as follows:
  - targeted training for colleagues delivered by updates from the Trust designated safeguarding lead (DSL) to academy safeguarding leads;
  - exposure to face-to-face training (in some of our academies) through the Tackling Emerging Threats to Children (TETC) Team (Nottinghamshire); and
  - a combination of EduCare modules (up to May 2021) and National College covering 'county lines' and child sexual exploitation through modern slavery courses.
- This has meant that staff are more aware of and responsive to the signs and the process of recording and highlighting any concerns, including using the ICTA referral mechanism within Nottinghamshire when appropriate.
- Risk management during the academic year included a particular focus on ensuring that risk management was fully integrated across academies and the Trust with increased collaboration in identifying, monitoring, and mitigating any threats.

## Procurement, supply chain management and due diligence



We are committed to ensuring that our direct suppliers adhere to the highest standards of ethics and use reasonable endeavours to encourage their suppliers to meet the requirements of the Modern Slavery Act.

The range of Diverse Academies' supply chains include, but are not limited to:

- facilities management maintenance and services
- education equipment, textbooks, and resources suppliers
- ICT equipment and services
- teaching supply/agency staff

We continue to purchase goods, services, and works in accordance with the Academies Trust Handbook (formerly the Academies Financial Handbook), which ensures compliance with current legislation and procurement best practice. Across our organisation we work with a preferred supplier list of specified, reputable employment agencies for classroom-based supply. We always verify the practices of any new agency before accepting workers from an agency. A letter of assurance is held for each agency and safeguarding checks are declared for each agency worker that is employed. Details of these are kept on the academy Single Central Record and updated termly.

### Progress and impact

- We collate and update data from all operational areas and academies to identify key suppliers.
- A continuous process of due diligence is underway to ensure all key suppliers to Diverse Academies have in place suitable and sufficient ethical procurement and recruitment policies, whether directly or by use of compliant frameworks.
- An ethical procurement code of practice has been produced and is available to our suppliers.
- Specific questions have been built into tender documents to support the requirements of the Modern Slavery Act moving forward.
- Robust clauses have been drafted and included in our standard terms and conditions to ensure existing and future suppliers meet the requirements of the Modern Slavery Act.

## Policies and procedures



We are committed to continued policy development, specifically around safeguarding children and young people – ensuring that we keep up to date with all changes in safeguarding legislation, including full compliance with the Modern Slavery Act. This statement links with and is referred to in appendix B in our safeguarding policy 2021, which is available to view on the [policies section of our website](#).

There is collective responsibility for all staff to manage risk and we expect all our staff to report concerns in conjunction with Home Office guidance, as set out in the [‘Support for victims of modern slavery’ document](#).

We work collaboratively to achieve equality in the education system and strive to ensure that employees feel confident in highlighting any issues that may arise while working for our organisation – which includes the Modern Slavery Act. We welcome and encourage members of staff to raise concerns with their line managers or appropriate senior leadership. If staff members are unsure about raising concerns initially with line management, then alternatively these can be raised with a trade union representative and/or the human resource department. In all cases of a referral, it is the expectation that the respective link governor for safeguarding is informed. Governors are encouraged to undertake additional CPD (continued professional development) on the modern slavery agenda via the National College and relevant content within the NGA.

### Progress and impact

- Modern slavery embedded into Trust safeguarding policy 2020/21 and included in face-to-face training led by DSL in academies and Trust DSL with Diverse Academies' central office staff. Efficacy tested through the safeguarding audit process throughout 2020/21. Staff across the organisation are increasingly aware of the modern slavery and human trafficking (MSHT) agenda as audited across the academies during 2020/21.
- Observational safeguarding recorded through MyConcern continues to highlight a small number of possible MSHT issues around 'county lines' and (very rarely) CSE (Child Sexual Exploitation).
- DSLs (Designated Safeguarding leads) on the ground are aware of the Nottinghamshire Independent Child Trafficking Advocacy Service (ICTA) referral process and all academies across Nottinghamshire and Lincolnshire via the National Referral Mechanism (NRM).

- Staff awareness through targeted training with TETC Team (Nottinghamshire) rolled out to staff teams as part of DSL delegated responsibilities and evidenced via safeguarding auditing process. Strong focus on CCE (Child Criminal Exploitation) and CSE (Child Sexual Exploitation).
  - Roll out to governors/trustees as part of their regular update training from the Trust strategic development leader for safeguarding. Exposure to wider reading via National College.
  - Whenever there is an uplift to the National Minimum Wage, National Living Wage and Apprentice rates, we always check to ensure that all staff are being paid correctly. This is especially important if a new school joins our Trust.
  - Both the safer recruitment and whistleblowing policies refer to modern slavery, with the whistleblowing policy having a hyperlink to the modern slavery helpline.
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## Culture and training



We are committed to promoting a culture of awareness amongst staff and stakeholders, by using both organisation-wide and intra-academy staff briefings to relay any significant changes to key legislation – including safer recruitment and procurement in line with the latest edition of Keeping Children Safe in

Education statutory guidance.

We also remain committed to ensuring the ethical and moral culture that underpins our approach to safeguarding is a key part of every employee's training from initial induction until they leave. All employees as a minimum expectation undertake accredited, mandatory training (more frequently than that specified in statutory guidance from the Department for Education) with additional training for identified staff. Designated safeguarding leads within each academy provide face-to-face training and advice.

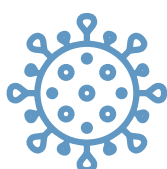
## Progress and impact

- Key elements of the Modern Slavery Act have been incorporated into safeguarding briefing updates and training. Staff awareness of the connection between MSHT and safeguarding culture and compliance (particularly regarding child sexual exploitation and county lines exploitation) is established through regular briefings from Nottinghamshire Safeguarding

Children Partnership (NSCP), Lincolnshire Safeguarding Children Partnership (LSCP) and the NSCP Forum.

- Refresher workshop September 2020 delivered to HQ staff (including executives) – focus on contextual safeguarding risks and Children Missing in Education (CME).
  - Signposted further training to EduCare and/or National College as part of governor update (March 2021).
  - DSLs (designated safeguarding leads) were made aware of and given access to the county referral document that feeds into the NRM – the Independent Child Trafficking Advocates (ICTA) form.
  - Additional online training available relating to safer recruitment, child protection and self-harm.
  - Each academy delivered its own bespoke training package incorporating contextual safeguarding, overseen by the respective academy DSL.
  - Continuing commitment to CPD (continued professional development), through 2020/21, for designated safeguarding staff across all academies across all phases – recorded via BlueSky and via the EduCare tracking tool (May 2021) and subsequently National College (May 2021 onwards).
  - Diverse Academies has continued representation on the NSCP Forum (a cross-disciplinary group of countywide safeguarding partners including police, Health Services and social services [local authority]). Two members of staff continue to attend this forum, accounting for one third of the entire representation from education/teaching sector in Nottinghamshire.
  - Industry sector best practice notes, and updates have been disseminated within the procurement team.
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## Response to Covid-19 pandemic



The pandemic, and subsequent partial closure of academy sites to full time education in 2020/21, has necessitated a refinement to the Trust safeguarding and attendance policies.

Safe and well checks for vulnerable children, using a Trust approved script, as well as local contextual knowledge of individual cases, have been undertaken by safeguarding personnel and pastoral leaders – knowledge of the indicators of potential MSHT are understood by Level 3 trained staff – this feeds in to the MyConcern referral process when applicable.

## Planned activities and managing effectiveness



Over the next 12 months, we will build on the safeguarding work already done to further develop our understanding and response to anti-modern slavery. In addition to updating key policies, carrying out due diligence and audits, raising awareness and delivering training, and maintaining a continued presence on local and national forums, our planned activities include:

### Risk management

- Further work to ensure a full and in-depth understanding of modern slavery is understood at all levels across the organisation – particularly in contextual and observational safeguarding at academy level and in response to the Covid-19 pandemic, staff have a heightened awareness of the risks to vulnerable young people not attending settings.
- The development of the risk management framework to integrate across all areas to include modern slavery is being further embedded.
- Ensure QA processes are reviewed and updated to monitor and measure impact of steps undertaken by our organisation to tackle modern slavery.
- Continue to monitor risk registers to ensure that any threats are monitored and action taken accordingly.

### Policies and procedures

- Continue to use stringent safer recruitment guidelines during all recruitment processes to ensure the same procedure is followed for all candidates.
- Continue to check employment contracts and procedures to ensure that modern slavery risks are minimised.
- Pay and reward policies and pay scales will continue to be reviewed annually in line with national minimum wage guidance.

### Supply chain due diligence and procurement

- Continue work on obtaining modern slavery statements and updated Letters of Assurance from first tier suppliers of goods and services where required by legislation.
- For those organisations who do not need to publish a statement (below threshold) we will continue to work with them to signpost guidance and produce a toolkit to encourage them to



meet the standards of the Modern Slavery Act and issue them our own ethical code of practice. The toolkit will be included in future tender and contractual documents to support smaller organisations that are not required to have a statement under legislation as a matter of good practice and further support the ethos of the legislation.

- New tender documents will ask bidders to provide copies of their modern slavery statements (if required by legislation) before contracts are awarded. In addition, any amendments or changes of the published document must be notified to us.

## Culture and training

- Continue to educate all staff to ensure that they are confident in what it entails and the actions and knowledge that are required of them in their roles.
- Attend relevant modern slavery training in key areas.
- Continue to identify and train relevant members of staff through dissemination of national and regional updates.
- The organisation continues to make senior leaders and DSLs (designated safeguarding leads) aware of the online training module on Raising Awareness of Trafficking and Modern Slavery via National College modules on County Lines and Child Sexual Exploitation
- Training records continue to identify those staff who have completed this module.

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## Approval

This statement has been approved by the Diverse Academies Trust Board on 2 February 2022



**Mike Quigley, Chair of Diverse Academies Trust**

View our statement for the financial year ending [31 August 2018](#), [31 August 2019](#) and [31 August 2020](#).