

Modern slavery and human trafficking statement

2023

Introduction

This document 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. It relates to actions and activities between 1 September 2022 and 31 August 2023 – our academic and financial year – and is reviewed on an annual basis.

We remain committed to the highest standards and the continuous improvement of ethical conduct in all our activities. This is the organisation's sixth annual modern slavery statement and focuses on the work, progress and impact that has taken place over the past year. It also sets out the planned activity to improve our processes going forward and ensure that we are taking a continued proactive approach to the prevention of modern slavery.

Our organisation



Diverse Academies Trust is a multi-academy trust – a company limited by guarantee and an exempt charity – operating across Nottinghamshire and Lincolnshire, delivering teaching and learning to children and young people. We have six secondary, six primary and two special academies, and we also have a shared sixth form centre facility, which is managed in partnership with the Minster Trust for Education (MITRE). We currently have over 8,500 pupils and students, and over 1,200 employees.

We are committed to promoting a culture of awareness amongst staff and stakeholders, by using both organisation-wide and academy staff briefings annually, to relay any significant changes to key legislation and organisation policy, practice or procedural changes. 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.

Risk management and assessment



We have a strong culture of risk management, and our policy and standard operating procedures reflect DfE good practice. The identification of risk, and the assessment of levels, takes place across the trust in an integrated and systematic way as part of day to day and planned practice. Our risk register is used to highlight key risks and for identifying future internal audits to be included in our audit programme. Our policies are reviewed on a cyclical basis, including those indirectly or directly connected to the

law, for example, our safeguarding and child protection policy. These regular reviews ensure our policies are compliant with legislation and the regulatory framework to continuously improve our practice. We have a planned safeguarding audit in early 2024.

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 (MSHT).

Our range of supply chains include, but are not limited to:

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

We continue to purchase goods, services, and works in accordance with the Academies Trust Handbook (formerly the Academies Financial Handbook). We have also made use of a range of Public Contracts Regulations (PCR) 2015 compliant frameworks, including those endorsed by Department for Education, which ensures compliance with current legislation and procurement best practice. We are investing in an e-procurement portal that our suppliers will be required to register on moving forward to give greater transparency.

Policies and procedures



We use a variety of sources to ensure our policies are relevant, compliant and effective. We are committed to using research and best practice examples to improve the way we implement our policies, so that they reflect the ever-changing landscape and needs of our students, staff, parents and Trust.

This includes safeguarding children and young people so that we keep up to date with relevant legislative changes to include compliance with the MSHT. This statement links with, and is referred to in our current [safeguarding and child protection policy](#). A review of modern slavery and human trafficking, in the context of safeguarding, is undertaken as part of the policy review process.

Our safer recruitment practices, detailed in our recruitment policy and procedures, along with a regard for Keeping Children Safe in Education, ensures that staff who have access to our students receive a full and robust recruitment process. This includes pre-employment checks including scrutiny of applications forms and employment history, verification of identity, appropriate references, right to work in the UK, verification of a candidates physical and mental fitness and Disclosure and Barring checks (DBS) and any other checks as appropriate.

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 or the human resource team.

Training and development



We use formal training days for core information dissemination and trust-wide updates. Individual development is identified through line management meetings.

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

- Modern slavery is embedded into Trust safeguarding and child protection policy 2022/23 and included in face-to-face training by Academy Designated Safeguarding Leads (DSL) in academies and Trust Strategic Development Leader (SDL) for Diverse Academies' head office staff. Efficacy is tested through the safeguarding review process.
- DSLs are aware of the Nottinghamshire Independent Child Trafficking Advocacy Service referral process and all academies across Nottinghamshire and Lincolnshire via the National Referral Mechanism.
- There remains a strong focus on Child Criminal Exploitation and Child Sexual Exploitation across the Trust with mandatory training to all staff on county lines.
- Updates to governors and trustees as part of their development programme from the Trust SDL.
- We continue to ensure that staff are paid in line or above National Minimum Wage ensuring that this is reviewed annually. 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.

- Regular and systematic reporting is in place around the effective implementation of our policies for procurement. This ensures we are compliant and that our approach to the procurement of goods and services is effective.
- We have an embedded process of due diligence 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.
- We are working on reducing the supplier base with the intention of building stronger and more productive partnership working with key suppliers.
- Specific questions have been built into tender documents to support the requirements of the MSHT moving forward ensuring we have an accountability approach to the Act.
- Robust clauses have been drafted and included in our standard terms and conditions to ensure existing and future suppliers meet the requirements of the Act.
- MSHT is incorporated into safeguarding briefing updates and training. This ensures that staff are aware of the connection between MSHT and safeguarding culture and compliance, particularly regarding CSE and county lines exploitation. Through regular briefings we work closely with Nottinghamshire Safeguarding Children Partnership (NSCP), Lincolnshire Safeguarding Children Partnership (LSCP) and the NSCP Forum.
- Additional online training is available to support safer recruitment and child protection.
- Our commitment to high quality CPD means that designated safeguarding roles receive relevant learning and development support.
- We review industry and sector best practice to facilitate knowledge sharing and improvement to our practice.

Planned activities 2023-2024



Over the next 12 months, we will build on the safeguarding work already done to further develop our approach and response to MSHT. In addition to updating key policies, carrying out due diligence through reviews and audits, raising awareness and delivering appropriate training, and maintaining a continued presence on local

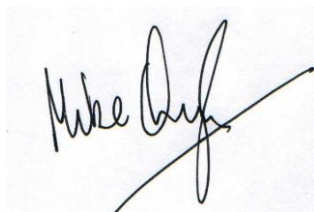
and national forums, our planned activities include the following.

- We continue to 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 to meet the standards of the Modern Slavery Act.

- All new tender documents 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. Moving forward within tender documents our own ethical code of practice will be included as well as information highlighting resources for organisations wishing to understand and support Modern Slavery legislation.
- Our procurement strategy supports MSHT. It also focuses on advancing equality and diversity rooted in ethical and sustainable procurement practices at all levels within Trust procurement to form a cohesive and holistic approach.
- Review feedback from practice or when policies are reviewed and amend/ adapt our processes as appropriate both in the policy and/or in this statement.
- Review this statement in each autumn term to consider its content in light of our social and corporate responsibility, considering compliance in line with the MSHT.
- Consider the appropriate way to introduce a set of KPIs to measure our performance against our approach.

Approval

This statement has been approved by the Diverse Academies Trust Board on 31 January 2024.

A handwritten signature in black ink, appearing to read 'Mike Quigley', with a long horizontal stroke extending to the right.

Mike Quigley, Chair of Diverse Academies Trust

View our statement for the financial year ending [31 August 2018](#), [31 August 2019](#), [31 August 2020](#), [31 August 2021](#) and [31 August 2022](#).