

# Modern slavery and human trafficking statement

2024

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## 1 About this statement

This document serves as the modern slavery and human trafficking transparency statement for the Diverse Academies Trust, meeting the requirements of section 54 of the Modern Slavery Act 2015. It outlines actions and progress made from 1 September 2023 to 31 August 2024 and sets out planned activities for the upcoming year to proactively prevent modern slavery.

We are committed to maintaining the highest ethical standards and continuously improving our conduct across all activities. This statement highlights the work undertaken over the past year, demonstrates its impact, and details future plans for advancing our processes and maintaining a proactive approach to addressing modern slavery.

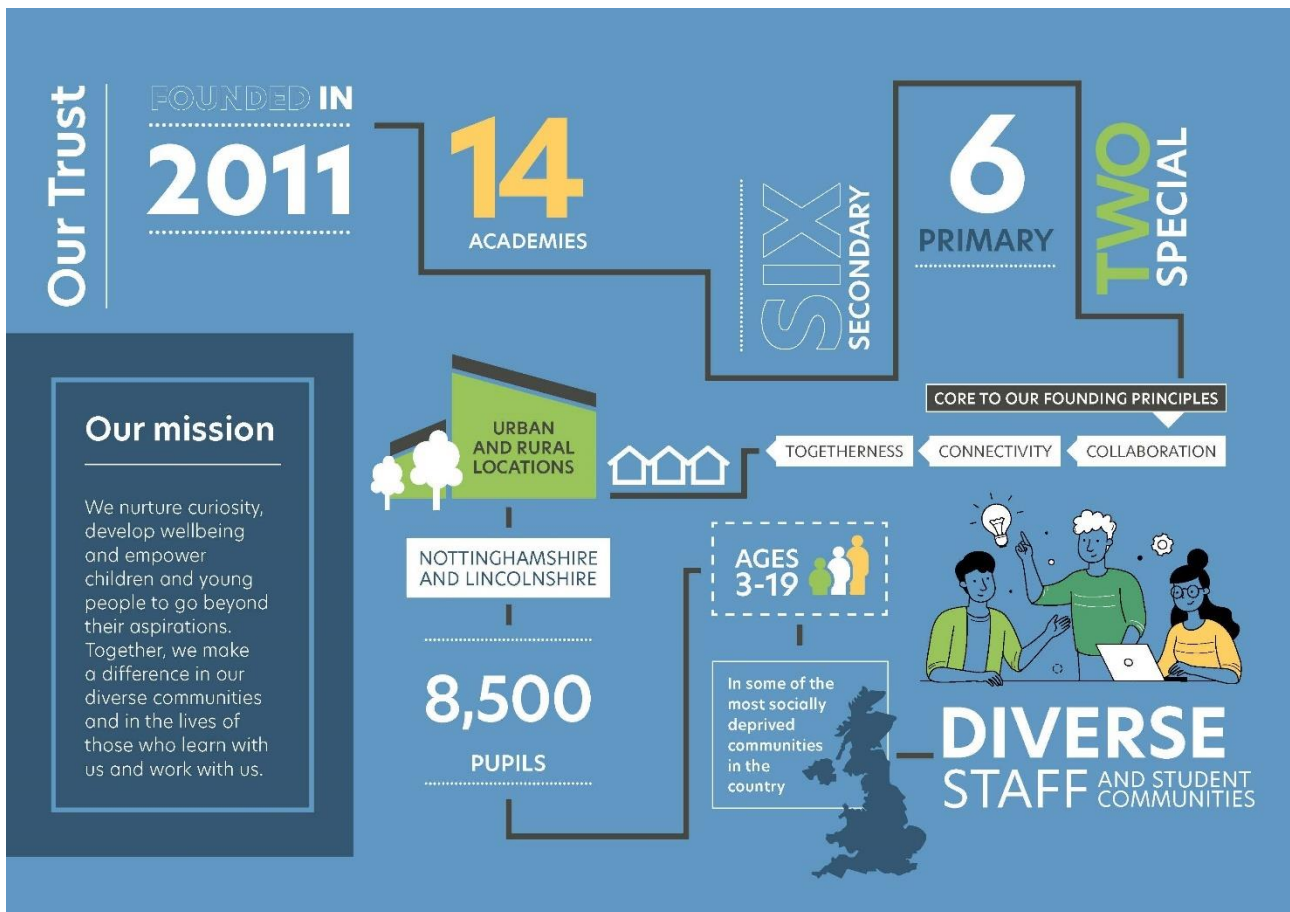
## 2 What is modern slavery?

Modern slavery involves severe exploitation where individuals are coerced, deceived or trapped into situations from which they cannot freely leave. In the context of a multi-academy trust, risks include the following.

- **Exploitation of supply chains** – this occurs if suppliers use forced or child labour, exploit workers by paying below minimum wage, or expose them to unsafe conditions. Sectors at risk include cleaning, catering, construction and IT equipment suppliers.
- **Exploitation of staff** – this may involve coercion, deception during recruitment, withholding wages or forcing workers (e.g. agency staff) to work under unfair conditions.
- **Exploitation of vulnerable groups** – staff may encounter students or families who are victims of trafficking for labour, criminal activities (e.g. drug transportation via county lines) or domestic servitude.

## 3 Our organisation structure and supply chains

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. Our Trust is comprised of 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 just under 8,500 students and over 1,200 employees.



Our supply chains span diverse sectors, including:

- facilities management, maintenance and related services;
- suppliers of educational equipment, textbooks and resources;
- ICT equipment and service providers; and
- teaching supply and agency staff.

While most direct suppliers are UK-based, their supply chains often extend internationally. We are committed to upholding the highest ethical standards and ensuring, as far as practicable, suppliers to adhere to the Modern Slavery Act.

#### 4 Policies and procedures in relation to slavery and human trafficking

We do not maintain a standalone modern slavery policy but incorporate these responsibilities across various related policy and procedural areas, including:

- procurement;
- recruitment;
- safeguarding and child protection; and
- whistleblowing.

We use a variety of sources to ensure our policies are relevant, compliant and effective. This includes ongoing research and best practice reviews to improve implementation, so policies align with the evolving needs of our people, stakeholders and legal landscape. Our commitment extends to ensuring alignment with the latest legislative requirements, including compliance with modern slavery and human trafficking laws. To reinforce awareness and adherence to these policies, staff are regularly briefed on updates through staff meetings and periodic newsletters. Training and development initiatives (see section 7) further complement these efforts.

Our procurement procedures embed modern slavery considerations into supplier selection and contracting processes. Suppliers are expected to provide modern slavery statements (where applicable) and demonstrate compliance with ethical and legal standards. We engage actively with our supply chains to raise awareness of modern slavery and promote continuous improvement.

Our safer recruitment practices, as outlined in our recruitment policy, align closely with Department for Education statutory guidance on keeping children safe in education. These practices ensure a thorough recruitment process for all staff with access to students. Pre-employment checks include scrutiny of application forms and employment history, identity verification, appropriate references, right to work in the UK, and Disclosure and Barring Service (DBS) checks, along with any other necessary checks.

In addition to recruitment safeguards, our safeguarding and child protection policy and related procedures play a pivotal role in raising awareness and educating students about modern slavery and human trafficking. Through a combination of curriculum-based education, tailored resources and interactive workshops, students are equipped to recognise the risks and signs of exploitation. Staff training, aligned with safeguarding protocols, ensures staff are prepared to address student concerns and provide appropriate support.

We encourage staff to raise any concerns they may have with their line manager or with senior leaders. For staff uncomfortable with this process, alternative channels are available, including trade union representatives or the people team. These mechanisms ensure all concerns are addressed promptly and appropriately.

## **5 Due diligence processes**

We continue to purchase goods, services and works in accordance with the Academies Trust 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 have invested in an e-procurement portal that our suppliers are required to register on and which provides us with greater transparency.

## **6 Risk assessment and management**

We have a strong culture of risk management, and our policy and standard operating procedures reflect Department for Education good practice. The identification of risk, and the assessment of risk levels, takes place across our organisation 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 statutory policies are reviewed on an annual basis. These regular reviews ensure our policies are compliant with legislation and the regulatory framework to continuously improve our practice. Occasionally, a case review (prompted by an internal event, case law or legislative change) may recommend policy amendments for clarification or additional information. These changes are made promptly and policies re-published without undue delay. In instances where a policy, process or procedure is amended, staff are briefed in a timely manner in order to ensure ongoing compliance and delivery of best practice.

## **7 Training on modern slavery and trafficking**

We are committed to promoting a culture of awareness of modern slavery amongst our people 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 have an ongoing commitment 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.

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.

## **8 Impact and progress**

Over the last 12 months, we have built on the safeguarding work already completed to further develop our approach and response to modern slavery and human trafficking. In addition to updating key policies, conducting due diligence through reviews and audits, raising awareness, delivering appropriate training, and maintaining a continued presence on local and national forums, we have successfully implemented the following activities.

- We have obtained modern slavery statements and updated letters of assurance from first-tier suppliers of goods and services where required by legislation.
- For organisations not required to publish a statement (below the threshold), we have worked with them to signpost guidance to meet the standards of the Modern Slavery Act.
- All new tender documents now require bidders to provide copies of their modern slavery statements (if mandated by legislation) before we award contracts. Additionally, we ensured that any amendments or changes to the published documents were notified to us. Our tender documents now include our own ethical code of practice and highlight resources for organisations wishing to understand and support modern slavery legislation.
- Our procurement strategy has successfully supported modern slavery and human trafficking and advanced equity and diversity, embedding ethical and sustainable procurement practices throughout all levels of our procurement processes for a cohesive and holistic approach. By ensuring clarity in our tender documentation – and, where applicable, requesting statements from bidders – we have demonstrated our ongoing commitment to supporting the Modern Slavery Act.
- Current procurement practices have continued to work effectively.
- We reviewed feedback from practice and when policies were updated, amending and adapting our processes as appropriate in the policies and in this statement.
- We reviewed this statement during the autumn term to evaluate its content in line with our social and corporate responsibilities and ensured compliance with modern slavery and human trafficking requirements.
- We determined and introduced an appropriate set of KPIs to measure our performance against our approach.
- A safeguarding audit took place in May 2024, with an overall conclusion of strong assurance.

## **9 Key performance indicators for 2024/25**

Aligned with our overarching organisational key performance indicators, the following measurement areas and associated metrics will be prioritised in 2024/25.

### **9.1 Policy improvements**

- Review all relevant policies (i.e. recruitment, procurement and safeguarding) annually to ensure compliance with the Modern Slavery Act and best practice. Target 100% completion within the year.
- Review key processes and procedures (i.e. recruitment, procurement and safeguarding) annually to confirm they are aligned with and effectively implementing policies. Target 100% completion within the year.

## 9.2 Procurement risk assessment

- Complete a procurement risk assessment to identify potential vulnerabilities. Target by year-end.
- Implement actions to address 90% of identified risks within six months of assessment. Target 90% completion.

## 9.3 Procurement Act compliance

- Make greater use of frameworks to ensure compliance with the new Procurement Act 2023 and collaborate with framework providers who conduct due diligence on modern slavery and human trafficking. Target implementation by February 2025.
- Review our procedures around procurement following the introduction of the Procurement Act and provide relevant training to colleagues. Target review and training completed by summer 2025.

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This statement has been approved by the Diverse Academies Trust Board on 29 January 2025.



**David Schwarz**

**Chair of Diverse Academies Trust**

**29.01.25**

View [previous modern slavery and trafficking statements](#).