

# **Modern slavery and human trafficking statement**

**2025**

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## 1 About this statement

1.1 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 2024 to 31 August 2025, and sets out planned activities for the upcoming year to continue to proactively prevent modern slavery and human trafficking.

1.2 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 and human trafficking.

## 2 What is modern slavery?

2.1 Modern slavery, as defined under the Modern Slavery Act 2015, involves the severe exploitation of people through coercion, deception or control, where individuals cannot freely leave or refuse the work or service.

2.2 In the context of a multi-academy trust, there are several areas where our organisation may be at risk of involvement in modern slavery and human trafficking, either directly or through third parties.

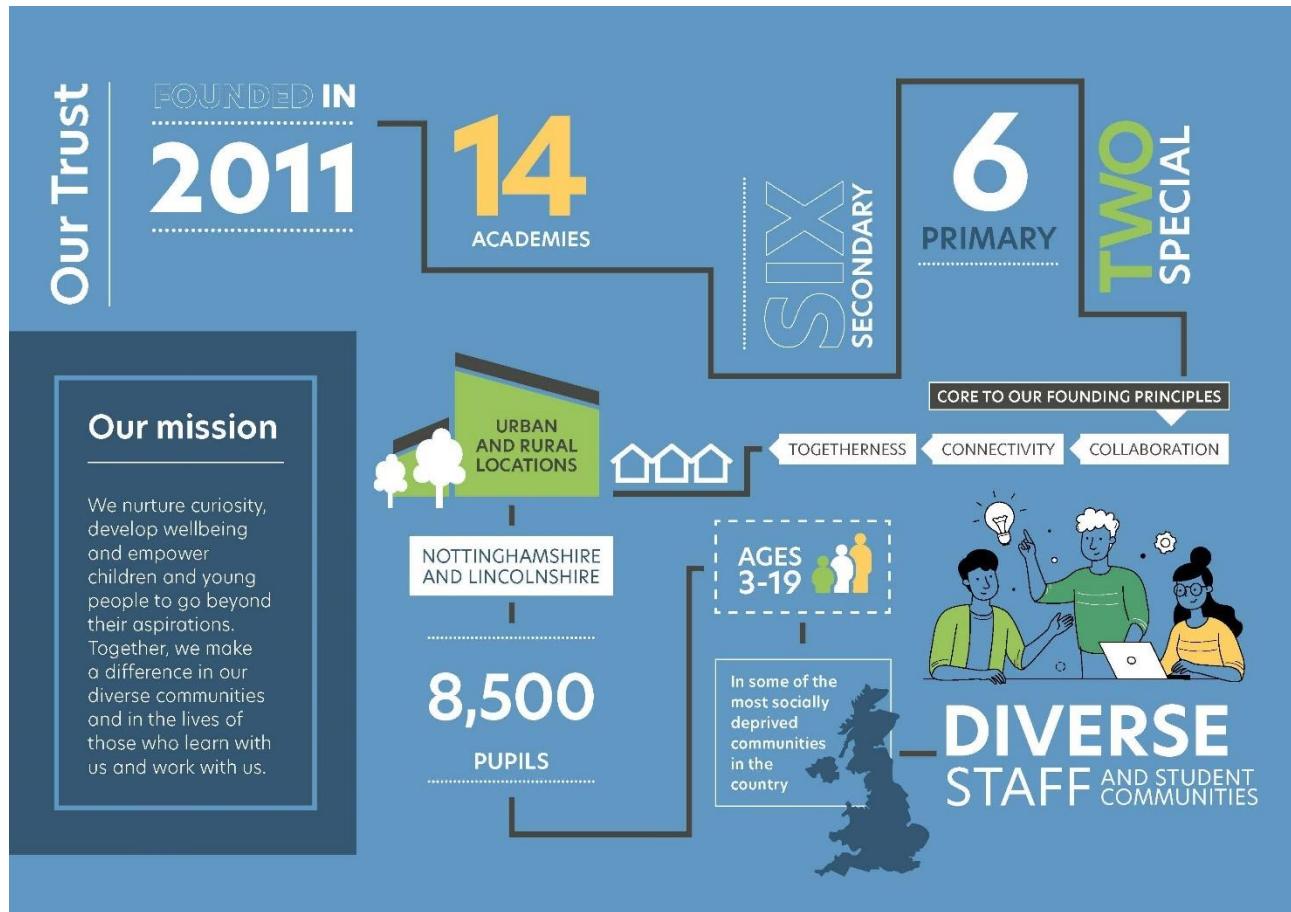
- **Exploitation in supply chains** – this occurs if suppliers use forced or child labour, exploit workers by paying below the minimum wage, or expose them to unsafe working conditions. Sectors that may present a higher risk include cleaning, catering, construction, IT equipment, uniforms, educational materials and transportation. These risks can exist both in the UK and overseas.
- **Exploitation of staff** – staff, including permanent staff, agency workers, contractors or volunteers, may be subject to coercion, deception during recruitment, withholding of wages, threats, or being forced to work under unfair or unsafe conditions.
- **Exploitation of vulnerable groups** – staff may encounter students, families or community members who are victims of trafficking for labour, criminal activities (for example drug transportation via county lines), sexual exploitation or domestic servitude. Modern slavery may also occur in digital spaces, including online grooming or exploitation.

## 3 Our organisation structure and supply chains

3.1 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.

3.2 During the 2024/25 academic year, our Trust comprised six secondary academies, six primary academies and two special academies. Until August 2025, one of our secondary schools was also served by a separate sixth form provision at Hucknall Sixth Form Centre, operated in collaboration with the Minster Trust for Education (MITRE).

3.3 During this period, student numbers remained stable at just under 8,500 and the average number of people employed by the Trust was just under 1,300.



3.4 Our supply chains cover a range of sectors where there is potential risk of modern slavery and human trafficking, including:

- facilities management, estates maintenance and related services;
- suppliers of educational equipment, textbooks, learning resources and curriculum materials;
- digital technology, hardware, software and managed service providers; and
- teaching, education support, supply, agency and other temporary staffing providers.

While most of our direct suppliers are UK-based, their supply chains may extend internationally.

We are committed to upholding high ethical standards and, as far as reasonably practicable, expect our suppliers to comply with the requirements of the Modern Slavery Act 2015.

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

4.1 We do not operate a standalone modern slavery and human trafficking policy. Instead, responsibilities relating to the prevention of these are embedded across a range of related policies and procedures, including:

- procurement;
- recruitment and safer recruitment;
- staff code of conduct;
- safeguarding and child protection; and
- whistleblowing.

4.2 Our policies are reviewed and maintained to ensure they remain relevant, effective and compliant with current legislation. This includes drawing on legal advice, sector guidance and recognised best practice to support continuous improvement, and ensure alignment with the evolving legal and operational landscape, including the requirements of the Modern Slavery Act 2015. To reinforce awareness and adherence, staff are kept informed of policy updates through staff meetings and periodic communications, including newsletters. Training and development activity (see section seven) further supports staff understanding of their responsibilities.

### **4.3 Procurement**

Modern slavery and human trafficking considerations are embedded within our procurement processes, including supplier selection and contracting arrangements. Where applicable, suppliers are expected to provide a modern slavery statement and demonstrate compliance with relevant ethical and legal standards. We also engage with our supply chains to raise awareness of modern slavery risks and to promote continuous improvement in responsible business practices.

### **4.4 Recruitment and safeguarding**

Our safer recruitment practices – as set out in our recruitment policy – are aligned with Department for Education statutory guidance, including keeping children safe in education. These practices ensure a robust and transparent recruitment process for all staff who work with or have access to students. Pre-employment checks include scrutiny of application forms and employment history, verification of identity, appropriate references, right-to-work checks, Disclosure and Barring Service (DBS) checks, and any other checks required for the role.

In addition, our safeguarding and child protection policies and procedures play a key role in raising awareness of modern slavery and human trafficking. Through curriculum-based education, tailored resources and age-appropriate learning opportunities, students are supported to recognise the risks and indicators of exploitation. Staff receive safeguarding training and updates through a

range of channels, including access to The National College, information shared via our online safeguarding platform (MyConcern), and contextual safeguarding intelligence provided by the local authority Education Safeguarding Health and Wellbeing Hub (ESHAWH). This ensures staff are equipped to identify concerns and respond appropriately in line with Trust safeguarding protocols.

#### **4.5 Raising concerns**

Staff are encouraged to report any concerns relating to modern slavery and human trafficking, safeguarding or other unethical practices to their line manager or a senior leader. For those who feel unable to do so, alternative reporting routes are available, including trade union representatives, via the people team (HR), or through our whistleblowing arrangements. These mechanisms ensure concerns can be raised confidentially and are addressed promptly and appropriately.

### **5 Due diligence processes**

5.1 We continue to procure goods, services and works in line with the requirements of the academy trust handbook. Where applicable, procurement activity also follows the Public Contracts Regulations (PCR) 2015 and the Procurement Act 2023, including guidance and frameworks endorsed by the Department for Education, ensuring compliance with current legislation and best practice.

5.2 To enhance transparency and due diligence, we have an e-procurement portal, which suppliers are required to register on. This system provides improved visibility of supplier information and supports monitoring of compliance with ethical, legal and contractual obligations, including expectations relating to the Modern Slavery Act 2015.

### **6 Risk assessment and management**

6.1 We maintain a strong culture of risk management, underpinned by policy and procedures aligned with Department for Education good practice. Risk identification and assessment are undertaken in a sequenced and structured manner, capturing risks at both local and corporate levels. Our governance framework ensures that these risks are escalated, reviewed and monitored appropriately, enabling the board and senior leaders to address emerging issues promptly and consistently.

6.2 Our corporate risk register captures principal risks and informs the planning of internal audits included in our annual audit programme. All statutory policies are reviewed on an annual basis to ensure compliance with legislation and the regulatory framework, supporting continuous improvement of practice. Ad hoc reviews may also be triggered by internal events, case law developments or legislative changes, with amendments made promptly to provide clarification or

additional guidance. Where policies, processes or procedures are updated, staff are briefed in a timely manner to ensure understanding, compliance, and the continued delivery of best practice.

6.3 This structured, governance-linked approach ensures that potential risks, including those relating to modern slavery and human trafficking, are identified, managed and mitigated effectively across the Trust.

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

7.1 We are committed to promoting a culture of awareness of modern slavery and human trafficking among all staff and stakeholders. This includes the use of The National College training modules tailored for education settings, together with organisation-wide and academy-specific briefings delivered annually to communicate significant updates to legislation, policies and procedural or practice changes.

7.2 We maintain an ongoing commitment to ensuring that the ethical and safeguarding culture underpinning our approach to modern slavery and child protection is embedded in every member of staff's training – from induction through to the end of their employment.

7.3 Formal training days provide core information dissemination and Trust-wide updates, while individual development needs are identified through line management meetings. All members of staff are required, at a minimum, to undertake accredited, mandatory training – delivered more frequently than the statutory guidance recommended by the Department for Education – with additional training provided for staff in roles identified as higher risk. Designated safeguarding leads within each academy deliver supplementary face-to-face training and provide ongoing advice to ensure staff are equipped to identify, respond to, and escalate concerns effectively.

## **8 Impact and progress**

8.1 Over the 2024/25 academic year, we have continued to build on our safeguarding and ethical governance framework to strengthen our approach to modern slavery and human trafficking. Progress has been achieved across policy, procurement, training and risk management, reflecting a continued commitment to compliance with the Modern Slavery Act 2015 and best practice guidance.

### **8.2 Policy and procedural improvements**

All relevant statutory policies, including recruitment, procurement and safeguarding, were reviewed during the year to ensure they remain compliant with legislation and aligned with sector best practice. Reviews incorporated the latest legal advice, expert input, and feedback from staff to ensure clarity of policy, accessibility and understanding of roles and responsibilities. Key processes and procedures underpinning these policies were also reviewed to confirm effective

implementation, ensuring that modern slavery considerations are embedded in day-to-day operations.

### **8.3 Procurement and due diligence**

A comprehensive procurement risk assessment was completed, identifying potential vulnerabilities. Actions to address identified risks were implemented within the agreed timeline, resulting in strengthened processes, greater transparency and more robust oversight. We have fully implemented compliance with the Procurement Act 2023, making greater use of approved frameworks for all applicable spend. This ensures due diligence on modern slavery and ethical standards is undertaken by framework providers, and that our own procurement processes meet legislative requirements. All new tender documents now require bidders, where applicable based on legislative thresholds, to provide modern slavery statements and to adhere to the Trust's ethical code of practice. Guidance and resources are provided to suppliers to support adherence to the Modern Slavery Act.

### **8.4 Procurement audit and governance actions**

During 2024/25, a procurement audit highlighted opportunities to strengthen governance, compliance and transparency across the Trust's purchasing processes. In response, we have taken a series of actions to enhance our oversight and ensure ethical, consistent procurement practice. These include progressing the development of consolidated procurement procedures, reinforcing staff training and monitoring of procedures, updating contract registers and introducing a centralised system for all contracts, and clarifying requirements for business cases and documentation. We have also reinforced processes and procedures relating to school trips and single tender waivers to ensure proper authorisation, record-keeping and oversight. Collectively, these measures have strengthened procurement governance and support our ongoing commitment to ethical practice and the mitigation of modern slavery risks.

### **8.5 Training, awareness and safeguarding**

We are committed to promoting a culture of awareness of modern slavery and human trafficking among our people and stakeholders. Rather than delivering standalone training, awareness is embedded across a range of safeguarding, induction, professional development and operational training activities. Trust-wide and academy-level staff briefings are used annually to communicate significant updates to legislation, Trust policy, and changes to practice or procedures.

An ethical and safeguarding culture underpins all training and forms a core part of every staff member's development from initial induction through to the end of their employment. Formal training days are used to disseminate key information and Trust-wide updates, with individual development needs identified through line management processes. All members of staff are required to complete accredited, mandatory training – delivered more frequently than the minimum

statutory guidance from the Department for Education – with additional training provided for staff in identified roles.

Designated safeguarding leads within each academy, and for our head office staff, provide face-to-face training, guidance and advice, supporting staff to identify, respond to and escalate concerns appropriately. Safeguarding audits, including one conducted in May 2024, provided strong assurance that safeguarding policies and procedures, including those relevant to modern slavery and human trafficking, are effective and consistently applied across the Trust.

## **8.6 Key achievements**

- All policy review KPIs for 2024/25 were completed successfully.
- Procurement risk assessment and associated mitigation actions were implemented in full.
- Compliance with the Procurement Act 2023 was achieved for all relevant spend.
- Enhanced monitoring and governance measures following the procurement audit have strengthened transparency, ethical standards and alignment with strategic objectives.

We continue to monitor and evaluate the effectiveness of our approach, embedding lessons learned, ensuring compliance with the Modern Slavery Act, and promoting a culture of ethical practice and safeguarding across all academies and operational functions.

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

9.1 Aligned with our overarching organisational key performance indicators, the following measurement areas and associated metrics will be prioritised in 2025/26.

### **9.2 Supplier assurance and modern slavery statements**

- Review and update records for all modern slavery statements held for existing suppliers to ensure they remain current and compliant. Target 100% completion within the year.
- Ensure all new suppliers meeting the legislative threshold provide a modern slavery statement prior to contract award. Target 100% compliance.
- Review and update Trust procurement documentation to reflect current government-issued financial thresholds, updated biennially in line with exchange rate changes. Target completion within the year.

### **9.3 Payroll and recruitment assurance**

- Undertake a payroll and recruitment audit during the 2025/26 academic year to provide assurance that recruitment and employment practices align with safeguarding, ethical standards and modern slavery legislation. Target completion within the year.
- Review audit findings and implement agreed actions in a timely manner. Target 100% completion within 12 months.

#### **9.4 Training, awareness and identification**

- Extend training coverage to a wider group of key staff across academies, including those involved in recruitment, procurement, safeguarding and pastoral support. Target implementation by year-end.
- Improve staff awareness and confidence in identifying vulnerable individuals and indicators of exploitation through embedded safeguarding and operational training. Target evidence of increased coverage and engagement within the year.

#### **9.5 Risk management and reporting**

- Strengthen the linkage of risk identification, assessment, moderation and reporting across the Trust, ensuring clarity of roles and responsibilities at all levels of risk management.
  - Agree updates to the risk management policy and implement a new set of supporting procedures and a training programme within the year.
  - Target measurable improvement in risk reporting, escalation and management over the following year, once the updates have been embedded.
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This statement has been approved by the Diverse Academies Trust Board on 4 February 2026.



**David Schwarz**

**Chair of Diverse Academies Trust**

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