

# Modern Slavery and Human Trafficking Statement | 2018

Diverse Academies Trust  
National Church of England Academy Trust



*Excellent teaching | Exceptional care | Outstanding performance*

## Introduction

**This statement constitutes the modern slavery and human trafficking transparency statement for the Diverse Academies Trust and the National Church of England Academy 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 2017 and 31 August 2018. It will be reviewed on an annual basis in line with our organisation's financial year, which runs September to August.**

We are committed to the highest standards, and the continuous improvement, of ethical conduct in all our activities. Our statement explains the steps that we have taken to date to prevent modern slavery from occurring within our organisation. This statement also sets out how we plan to develop enhanced policies and procedures, 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



Our organisation comprises of two trusts, **Diverse Academies Trust (DAT)** and **National Church of England Academy Trust (NCEAT)** – who work in a formal partnership and together form the **Diverse Academies Learning Partnership** (known as 'Diverse Academies').

DAT is a multi-academy trust comprised of secondary, primary and special academies. It is a company limited by guarantee and an exempt charity. NCEAT is a single academy trust comprised of one Church of England academy. It is also a company limited by guarantee and an exempt charity.

Each trust has its own Board. These Trust Boards work closely with the overarching Diverse Academies Board, which is made up of all DAT trustees and three nominated trustees from NCEAT. The overarching Diverse Academies Board ensures that all legal and statutory responsibilities are carried out, and sets the overall strategic direction of the partnership.

Diverse Academies operates in the education sector across Nottinghamshire and Lincolnshire, delivering education to pupils and students. It also works in conjunction with Trent Valley Teaching School Alliance (TVTSA) to deliver initial teacher training and CPD programmes. All staff within our organisation report ultimately to the Executive Leadership Team, headed by the Chief Executive Officer, who in turn reports to the Diverse Academies Board.

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## Risk management and assessment



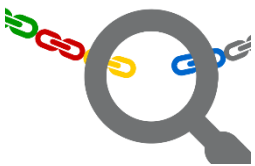
Our safeguarding policy and practice is audited on an annual basis, and assesses if any safeguarding practices represent a risk to our organisation's compliance within the relevant legislation. In each of our academies a risk register is managed through GRC ONE risk management software and includes all statutory areas of risk.

All of our staff are responsible for the administering and reporting of risk, and should refer to the Diverse Academies' risk management policy and strategy documents for guidance on the adoption of tight principles and practice.

A network group of 'academy risk champions' meet six times a year to review, monitor and receive training and support on maintaining the individual academies risk registers. The risk system allows for an organisational overview of risk registers, which are audited on an annual basis by the Business Development Manager at each academy site. This overview is presented at the Audit Committee and the Diverse Academies Board, as well as in local academy meetings as required. Both internal and external auditors also scrutinise the registers as part of the financial audit process, as well as ensuring that the quality assurance programme is being adhered to.

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## Procurement, supply chain management and due diligence



We are committed to ensuring that our direct suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

We are working with our suppliers to ensure that they meet the requirements of the Modern Slavery Act 2015. In doing so, we will also support wider industry initiatives to tackle this abuse and discrimination, such as through working with construction and services sectors.

We purchase goods, services and works in accordance with the Academies Financial Handbook, which ensures compliance with current legislation and procurement best practice. A process of due diligence is to be undertaken to ensure all key suppliers to Diverse Academies have in place suitable and sufficient ethical procurement and recruitment policies. Where evidence of non-compliance is identified, this will be raised with our senior management teams.

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

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.

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## 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 makes reference to section 16.5 in the trust's safeguarding policy, which is available to view on our website:

[www.dalp.org.uk/about-us/policies](http://www.dalp.org.uk/about-us/policies).

We expect all our staff to report concerns in conjunction with Home Office guidance, as set out in the document: [www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery](http://www.gov.uk/government/publications/how-to-report-modern-slavery/how-to-report-modern-slavery). 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.

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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 keeping children safe in education statutory

guidance. Key elements of the Modern Slavery Act will be incorporated into future staff safeguarding briefing updates from September 2019.

We are also committed to ensuring that relevant training is given to staff at all levels in the following areas:

- child safeguarding
- whistleblowing
- grievance
- recruitment
- equal opportunities
- dignity at work

The ethical and moral culture that underpins our approach to safeguarding is a key part of every employee's training, from their initial induction until they leave. All employees undertake mandatory training on safeguarding children and young people, prevent, and female genital mutilation awareness, as a minimum expectation. Staff are also exposed to additional online training encompassing, for example, safer recruitment, child protection and self-harm. In addition to the training given across our organisation, each of our academies delivers its own bespoke package incorporating 'contextual safeguarding' – which is overseen by the respective academy Designated Safeguarding Lead.

Training is required to be refreshed by all staff every two years, in excess of the statutory guidance from the DfE. Additional safer recruitment training, for designated staff, is refreshed every five years.

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## 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. Our planned activities include:

- Continuing to update key safeguarding policies annually, as driven by the organisation's safeguarding lead
- Ensuring that modern slavery is addressed through the safeguarding audit process by implementing new due diligence and risk checks. This will be completed annually as part of the internal audit conducted by the safeguarding lead
- Providing specific Modern Slavery Act training when available, to key individuals and teams across the organisation who are responsible for leading safeguarding in each academy

- Awareness raising across the organisation via internal communication channels by publishing a full copy of the Modern Slavery Act (along with a simplified overview) on the safeguarding SharePoint hub site, to ensure it is accessible to all Designated Safeguarding Leads, Executives and Board
- Devise a QA process to measure impact during 2018/19 and beyond. Include within safeguarding reviews – HR elements, training, SCR checks for procurement
- Risk and compliance – update local risk registers and Audit and Risk Committee once the statement has been issued and made public
- Identify and train relevant members of staff through dissemination
- Supply chain due diligence:
  - liaise with all operational colleagues to identify key suppliers within finance, marketing, ICT, data management, hospitality, education, training and governance
  - obtain Modern Slavery Statements and Letters of Assurance from first tier suppliers of goods and services
- Procurement:
  - attend industry training on modern slavery in purchasing practices
  - draft ethical procurement code of practice for Board approval
  - include reference to modern slavery and ethical procurement in the new procurement policy and procedure
- HR:
  - update policies to describe the organisation's approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations
  - check employment contracts and procedures to ensure that modern slavery risks are minimised

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## Approval

This statement has been approved by the Diverse Academies Board on 6 February 2019 and referred to the DAT Board for approval and signature on 13 February 2019.



John Rolph  
Chair of Diverse Academies Trust  
13 February 2019

This statement has been approved by the Diverse Academies Board on 6 February 2019 and referred to the NCEAT Board for approval and signature on 13 February 2019.



Kathryn Mitford  
Chair of the National Church of England  
Academy Trust  
13 February 2019