

Modern slavery and human trafficking statement

2022

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 2021 and 31 August 2022 (the 2021/22 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 fifth 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 proactive approach to the prevention of modern slavery.

Our organisational structures



Diverse Academies is a multi-academy trust comprising six secondary, six primary and two special academies. We also have a shared sixth form centre facility in Hucknall, which is managed in partnership with the Minster Trust for Education (MITRE).

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 which offers a wide range of development opportunities to all staff. The Association complements the work of Redhill Teaching School Hub, of which Diverse Academies is a strategic partner, focusing on initial teacher training, early career framework and national professional qualifications.

We currently have over 8,400 pupils and students, and over 1,200 employees. 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, we archived the Covid-19 pandemic appendices in response to full re-opening.

Academy risk registers are regularly updated and reviewed at both academy and Trust level. We re-launched our risk management approach, educating and embedding a positive risk management culture across the organisation during 2021.

Progress and impact

- Reference to modern slavery, and in particular child criminal exploitation (CCE)/county lines related risk, 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 CCE, child sexual exploitation (CSE) 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 new designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL) colleagues delivered by updates from the Trust DSL to academy staff as and when a change in personnel arises;
 - exposure to face-to-face training (in some of our academies) through the Tackling Emerging Threats to Children (TETC) Team (Nottinghamshire); and
 - National College training modules covering county lines and CSE.
- 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 Independent Child Trafficking Advocate (ICTA) referral mechanism within Nottinghamshire when appropriate.
- All staff have been appraised of the importance of the low level concerns log - held in each academy and at central office. Where concerns regarding possible exploitation and trafficking occur, staff would report into this initially, from where an escalation decision would be made by the respective academy/Trust leadership.
- During the academic year there continued to be an emphasis 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.

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. Across our organisation we work with a preferred supplier list of specified and reputable employment agencies for classroom-based supply. We have moved to a central organisation, which ensures all relevant checks and vetting of both the agency and staff are undertaken before engaging staff. 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 continue to 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.
- We are working on reducing the supplier base to improve the buying power we have, but also build stronger and more productive partnership working with key suppliers.
- An ethical procurement code of practice has been produced and is available to our suppliers. This will be included in all future invitations to tender.
- 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.
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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 is referred to in appendix A in our current [safeguarding and child protection policy](#). A full review of modern slavery and human trafficking (MSHT), in the context of safeguarding, was undertaken in summer term 2022, in time for the new safeguarding and child protection policy 2022/23.

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 continued professional development (CPD) on the modern slavery agenda via the National College and relevant content within the National Governance Association (NGA).

Progress and impact

- Modern slavery embedded into Trust safeguarding and child protection policy 2021/22 and included in face-to-face training led by the DSL in academies and Trust DSL with Diverse Academies' head office staff. Efficacy tested through the safeguarding audit process. Staff across the organisation are increasingly aware of the MSHT agenda.
- Observational safeguarding recorded through MyConcern continues to highlight a small number of possible MSHT issues around county lines and (very rarely) CSE. In 2021/22 this

numbered three classified as suspected CCE, six as suspected county lines and eight as suspected CSE across the Trust.

- DSLs 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 in several academies continued through targeted training with TETC Team (Nottinghamshire) to staff teams as part of DSL delegated responsibilities and was evidenced via safeguarding auditing process. There was a strong focus on CCE and CSE across the Trust with mandatory training to all staff on county lines - to be completed within two years from September 2021 or upon appointment thereafter.
 - 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.
 - 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.
 - Both the safer recruitment and whistleblowing policies continue to 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. Where specific training is required we use formal training days for core, trust-wide training and individual development is identified through line management meetings.

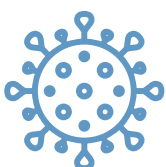
We also remain committed to ensuring the ethical and moral culture that underpins our approach to safeguarding is a key part of every employee's training from initial induction until they leave. All employees as a minimum expectation undertake accredited, mandatory training (more frequently than that 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 CSE 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 awareness training September 2021 and in January 2022 delivered to head office staff (including executives) on contextual (community) safeguarding risks and children missing in education (CME).
- Signposted further training to National College as part of governor update (January and June 2022).
- DSLs were made aware of and given access to the county referral document that feeds into the NRM - the ICTA form.
- Additional online training available relating to safer recruitment, child protection and self-harm. All safer recruitment leads must have this training before leading an interview panel
- Continuing commitment to CPD, through 2021/22, for designated safeguarding staff across all academies across all phases - recorded via BlueSky and the National College.
- We have continued our 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.

Response to post-Covid-19 pandemic



Safe and well checks and risk assessments for vulnerable children, as well as local contextual knowledge of individual cases, have been undertaken by safeguarding personnel and pastoral leaders in the immediate post-pandemic educational climate. A decline in attendance in 2021/22 from pre-pandemic levels has made

knowledge of the indicators of potential MSHT even more important to our academy leaders and safeguarding teams. These risks fed into 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 the following.

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 threats posed by the post-Covid-19 pandemic and ‘cost of living crisis’, placing immense economic and social stress on already vulnerable families. 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 quality assurance 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.
- Instruct our internal auditors to carry out a full review of our risk management approach in November 2022 and the findings to be presented to the Audit and Risk Committee and the Trust Board.

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


- 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 asks 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 draft three-year procurement strategy which will be adopted in the early part of 2023 continues to support the Modern Slavery Act, but 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.

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 aware of the local offer via NSCP/TETC and all online training modules on raising awareness of trafficking and Modern Slavery via National College safeguarding modules on county lines and CSE.
- Training records in National College continue to identify those staff who have completed these modules.

Approval

This statement has been approved by the Diverse Academies Trust Board on 1 February 2023.

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](#) and [31 August 2021](#).