Modern Slavery and Human Trafficking Statement

September 2022

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1. INTRODUCTION

Delta Academies Trust (the Trust) is a multi-academy sponsor with a clear geographical context in the Yorkshire and Humberside region. In that capacity, it acts as one employer across all the Academies, which it sponsors.

Delta Academies Trust is also an exempt educational charity, subject to company law and is a not for profit organisation. The Board of Trustees is the legal governing body of all academies within the Multi Academy Trust and remains accountable in law and to OFSTED and the Education and Skills Funding Agency for the exercise of its functions. Its Trustees, who are appointed on a voluntary basis, are drawn from the public and private sector, and bring significant educational and other professional expertise.

The Trust is committed to combatting modern slavery and human trafficking within the Trust and its supply chain and ensuring full compliance with the Modern Slavery Act 2015.

2. STRUCTURE AND SUPPLY CHAINS

This statement covers the activities of Delta Academies Trust and its 52 academies.

The Trust is responsible for the leadership, governance and performance of a wide range of academies including infant, junior, primary, all-through, secondary, alternative provision academies and three free schools. It seeks to drive up educational standards utilising educational expertise, capacity and experience to secure transformational change in the future life chances of all young people in its charge. The Chief Executive Officer, Paul Tarn is a highly experienced National Leader of Education, with an outstanding record of rapid school improvement.

The Trust works primarily with UK based suppliers and contractors and employees are protected under UK employment law and working time directives. We remain aware of the need to ensure that the Trust and companies within our supply chain share our commitment to treating employees ethically and with integrity. When considering the organisation's activities, we believe that the risk of slavery and human trafficking is low.

3. RISK ASSESSMENTS

Risk management is embedded throughout the Trust's operations, with any risks identified and mitigations being shared with the Trustees through the Audit and Risk Committee. The Trust engages with an independent Internal Audit service who review and report on adherence to policies and procedures. Non-compliance, if identified, is reported to the Board of Trustees through the committee.

The Trust has assessed its risks of modern slavery and human trafficking and has included below specific activities that may be considered as a risk to the Trust:

High Risk – Given the nature of the operations of the Trust, we do not believe there to be any activities that would constitute high risk either within the Trust or our supply chain.

Medium Risk – Supply Chains linked to the external provision of catering and cleaning. The supply of Uniform where the contracted supplier uses an oversea company for manufacturing.

Low Risk – Contractors using subcontractors on large Capital projects.

Risks are mitigated through the tender process. (see part 6 – Procurement).

4. OUR POLICIES ON MODERN SLAVERY

We have reviewed our existing policies and procedures in light of the Act. We are confident that our policies promote good behaviour among our colleagues at work and within our Trust. Our policies and procedures are kept under review to make sure that they reflect the changing needs of the Trust and of the staff, students/pupils and the communities it serves.

Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act are:

- Code of Conduct & Confidentiality;
- Equality & Diversity Policy;
- Anti - Fraud Policy;
- Gifts, Hospitality & Related Party Policy;
- Procurement Strategy;
- Safer Recruitment Policy;
- Whistleblowing Policy.

The whistleblowing policy also draws attention to the risk of modern slavery or human trafficking and we would expect employees to report any concerns in relation to those matters under the protection of the whistleblowing policy.

All tenders for supply of services and or goods include a requirement for the supplier to report on their ethical trading including ensuring they also comply with the Modern Slavery Act 2015.

5. RECRUITMENT AND TRAINING

We have discussed the Act, its purpose and the Trust's attitude to it at a Board of Trustees meeting. We have alerted the Executive Leadership Team to it and challenged them to continue to consider where the risk of modern slavery or human trafficking may arise in the Trust.

Our recruitment processes include rigorous pre-employment checks for all new employees. These include the following checks on identity, right to work in the UK, references, qualification and checks with the Disclosure and Barring Service. We must ensure that all applicants are genuine and acting freely. Similar checks will be carried out when using Supply Agencies.

Fair Pay

The Trust is committed to ensuring all employed and contracted staff receive fair remuneration for the job they perform. The Trust is committed to paying above the National Living Wage and in 2021/22 the lowest paid salary was £9.60 per hour (National Living Wage £9.50), Apprentices are also paid the National Minimum Wage based on age, with a minimum of £5.21 per hour.

6. MEASURING EFFECTIVENESS

All key suppliers considered to be a risk to modern slavery and human trafficking are tendered by the central team at Head Office rather than locally at academies. This allows us to review and adapt our processes and to monitor the performance of these contracts on a regular basis, especially where they are considered to be high/medium risk.

7. PROCUREMENT

We have provided guidance to our procurement team on the need to avoid the risk of modern slavery and human trafficking and on the possible indicators that may arise during the procurement process. We have included within all tender documents the

need for suppliers to report on whether they are compliant with the Act and as part of our due diligence we request copies of their Modern Slavery and Human Trafficking Statement. Where there is additional risk identified at the start of the tendering process additional checks will also be carried out.

We will continue to ensure that our suppliers always provide a safe working environment and act ethically. Where a high or medium risk was identified we will carry out a review during the contract to ensure the suppliers remain compliant. Where we feel a supplier is not adhering to this Act, this could lead to the termination of a supplier's contract. This includes ensuring compliance with the government published National Living/Minimum Wage. We will continue to enhance the assurances we seek from suppliers as to their avoidance of modern slavery and human trafficking.

8. OUR COMMITMENT

The Trust has noted the requirements of the Modern Slavery Act 2015 (the "Act"). This statement is made on behalf of Delta Academies Trust (updated December 2021) in line with the disclosures included within the Trust Financial Statements for the year ended 31 August 2022 approved by Directors on 21 September 2022.

This statement has been approved by the Trust Board of Directors and is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Paul Tarn

Chief Executive Officer

21 September 2022