



David Ross Education Trust
Broadening Horizons

Modern Slavery Statement for financial year ending August 2022

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps The David Ross Education Trust has taken and is continuing to take to understand and minimise the potential risk of modern slavery and human trafficking in our supply chains or in any part of our business.

Our Structure, our business and our supply chains

Established in 2007, The David Ross Education Trust is a Multi-Academy Trust, sponsored by The David Ross Foundation. The Trust comprises 34 academy schools across the country. Our schools range from smaller rural primaries with around 50 children, to much larger secondary schools in the centre of urban areas.

As part of the education sector, the Trust recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is committed to acting ethically and with integrity when acquiring goods and services. The Trust is committed to creating and ensuring non-discriminatory and respectful working environment for its staff.

Policies

The Trust reviews policies and procedures on an ongoing basis to ensure they remain legally compliant and fit for purpose. The following policies and procedures are considered to be key in meeting the requirements of the Modern Slavery Act.

Safeguarding and Child Protection Policy

The Trust embraces its responsibility to develop, implement and monitor policies and procedures to safeguard and promote the welfare of children. The Trust Safeguarding and Child Protection Policy incorporates all statutory guidance as required in 'Keeping Children Safe in Education' as it is updated, as well as 'Working Together to Safeguard Children 2018. All academies are required to supplement the Trust Safeguarding and Child Protection policy with contextualised information including the local risks of child exploitation. The policy is reviewed annually as required and all Trustees, Governors, staff and volunteers are expected to read and comply with its instructions. In addition, safeguarding practice is in accordance with non-statutory guidance such as 'Safeguarding children who may have been trafficked' 2011. Designated Safeguarding Leaders work with local authority safeguarding partners to protect children deemed at risk of exploitation under Sections 47 and 17 of the Children Act 1989.

HR / Employment Policies and Practices

The Trust is highly committed to advancing equality, eradicating unfair treatment, and promoting good relations across and between all our communities.



David Ross Education Trust
Broadening Horizons

We have clear and rigorous HR policies and procedures and high standards for employees that minimise the risk of any form of modern slavery existing within the organisation.

The Trust has procedures and policies in place on all major employment issues, for example, disciplinary, grievance, harassment and bullying, Code of Conduct, Whistleblowing Procedures, as well as other policies and/or procedure that support fair treatment of employees including attendance management and ill health capability, performance capability, performance management, recruitment and selection.

Recruitment

The Trust's recruitment processes are transparent and reviewed regularly. They include robust procedures for vetting new employees, which ensures they are able to confirm their identities and qualifications, and they are paid directly into an appropriate, personal bank account. All Trustees, Governors and Staff are required to have an Enhanced Disclosure and Barring Service check which details all criminal history; cautions, warnings, reprimands and convictions held on the Police National Computer. To comply with the Asylum, Immigration and Nationality Act 2006, all prospective employees are asked to supply evidence of their eligibility to work in the UK. References are also requested and completed in writing.

Agency Workers

The Trust has engaged supply agencies via the Government's Crown Commercial Services. Not only does this platform use only reputable employment agencies to source labour, but the framework has a strong vetting process which verifies the practices of the agencies. These agencies are audited by the CCS to ensure they meet all legislative requirements. Introduction of new agencies is subject to a variation process and strict compliance checks.

Codes of Conduct

The Trust's Code of Conduct for Employees, and for Trustees and Governors makes clear the actions and behaviours expected of them when representing the Trust. The Trust strives to maintain the highest standards of employee conduct and ethical behaviour and breaches are investigated.

Whistleblowing

The Trust encourages all its employees to report any concerns relating to activity that is deemed illegal, unethical, or not correct within the organisation. The Trust's procedure is designed to make it easy for employees to make disclosures, without fear of harassment or victimisation.

Procurement Contractors and Service Providers

The Trust uses a range of suppliers for a wide variety of supplies and services which can make it challenging to effectively review and challenge all suppliers. At present the Trust does not conduct



audits of its suppliers and their business activities nor does it investigate working conditions in its supply chains. The Trust does appoint suppliers via pre-approved public sector frameworks or a tender process, where possible. As part of this process, suppliers are required to provide a warranty to comply with the Modern Slavery Act 2015. We reserve the right to exclude a bidder who has been convicted of modern slavery offences.

The Trust has identified areas where modern slavery offences are more likely to occur, for example; cleaning, catering, maintenance, construction and clothing suppliers. For procurement activities within these high risk areas, mandatory compliance checks are undertaken at an early stage in the procurement process. The Trust's procurement policy includes a direction to staff to challenge tender responses that appear unusually low in price, as this could be an indication of modern slavery.

Equality and Diversity

The Trust recognises that equality, diversity and inclusion is integral to fostering an inclusive, professional and secure place of work and study and welcomes its duty under the Equality Act 2010 and The Public Sector Equality Duty 2011. The Trust is committed to eliminating any forms of unlawful discrimination, harassment and victimisation; advancing equality of opportunity between different groups and; fostering good relations between different groups across our Trust Community. We expect all our Trustees, Governors and staff to treat everyone with dignity and respect and provide the best possible standards of education to all of our pupils.

Training and Awareness

The Trust has a programme of induction and ongoing mandatory training that all employees must complete, including Safeguarding Training which is undertaken annually. This ensures individuals know how to recognise and report incidents of abuse and neglect, including modern slavery and human trafficking.

Further Actions

Following the production of this statement, The David Ross Education Trust commits to undertaking the following steps over the next academic year:

- Circulate this updated statement to all staff to raise awareness of the policy.
- Continue to include modern slavery training into the induction for all employees.
- Roles are recruited to a national pay scale, with clearly advertised rates.
- Implementation of job evaluation for determining pay.
- Reduce and monitor the use of agencies employed outside the framework.
- Circulate information and training to appropriate staff to make them aware of the key signs of modern slavery, what to do if they suspect that someone might be in slavery and what to check when dealing with suppliers.
- Include compliance with Modern Slavery Act 2015 as a condition for all tender documents.



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Broadening Horizons

- Include compliance with Modern Slavery Act 2015 as a condition to become an Approved Contractor.
- Monitor our effectiveness in combating slavery and human trafficking in our organisation by recording and monitoring the number of reports received from employees, the public, or law enforcement agencies.
- Child Sexual Exploitation data will be collected centrally and reported annually.

Reporting

To date, no referrals have been made in relation to modern slavery.

This statement was approved by the Trust Board on 5th December and will be reviewed annually.

**Stuart Burns Chief Executive Officer
The David Ross Education Trust**