David Ross Education Trust
Broadening Horizons

Modern Slavery Statement for financial year ending August 2024

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. As of 2nd December 2024, the Trust comprises 36 academies 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.

The Trust has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls, to ensure modern slavery is not taking place anywhere in our own organisation or in any of our supply chains.

We are also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect and require that our suppliers will hold their own suppliers to the same high standards.

This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.

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 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 2023. 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, each academy publishes its own contextual appendix which is informed by an awareness of local risks and 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.
Safeguarding practice is in accordance with non-statutory guidance such as 'Safeguarding children who may have been trafficked' 2011.

All staff are trained in fulfilling the academy's responsibilities for safeguarding and referring potential child victims of modern slavery to Children's Social Care, recognising that all child exploitation is a form of child abuse. Safeguarding staff will ensure information is shared with the respective local authority as part of a multi-agency inputted NRM referral led by either social care or police.

Staff working to improve pupils' attendance are trained to understand the importance of talking to children about their absences to uncover indicators of modern slavery/trafficking that should raise curiosity such as tiredness, substance use/abuse, possessions, anxiety, and fear. The welfare curriculum supports pupils' awareness of key issues in their relationships and the wider world, including exploitation and coercion linked to human rights, covering different types of exploitation including domestic, labour, sexual and criminal.

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.

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 can 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 (DBS) 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 (CCS). 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 Policy, Standards and Procedures

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 will 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 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.

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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.
- Circulate a copy of the Procurement Policy and Standards and Procedures to all staff to raise awareness of the Procurement rules.
- 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.
- Necessitate the use of published DRET template tender documents and DRET contract terms which include compliance with Modern Slavery Act 2015.
- Include compliance with Modern Slavery Act 2015 as part of the new supplier set up, and survey existing suppliers via new procurement portal.
- 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 2nd December and will be reviewed annually.



Stuart Burns, Chief Executive Officer
The David Ross Education Trust