

Policy:	Modern Slavery
Owner:	TDET Human Resources
Approving Board:	Executive Group
Date of review:	September 2022
Date of next review:	January 2024
Publish Status:	TDET Website, TDET SharePoint
Version:	V1



TDET Modern Slavery Policy

1 Introduction

- 1.1 This statement is designed to satisfy the requirement of Part 6 Section 54 of the Modern Slavery Act (2015).
- 1.2 Thomas Deacon Education Trust (TDET) recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is committed to preventing slavery and human trafficking within its activities and to ensuring that its supply chains are free from slavery and human trafficking.
- 1.3 This statement sets out TDET's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

2 Our Approach

2.1 We work with the highest professional standards and comply with all laws, regulations relevant to our organisation. We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation. We act ethically and with integrity in all of charitable and business relations

3 Identifying and addressing risks

- 3.1 We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact TDET. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact pupils. This also potentially affects our employees. The second is our supply chain and vendors we contract.
- 3.2 The Organisation considers that modern slavery encompasses:
 - human trafficking
 - forced work, through mental or physical threat
 - being owned or controlled by an employer through mental or physical abuse of the threat of abuse

- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

4 Supply chain

- 4.1 Our suppliers are expected to comply with all local and national laws and regulations. This includes paying their staff the minimum wage, and any on-site staff passing a DBS check. Should suppliers fail to meet our minimum requirements, or be willing to make changes, we may cease to trade with them.
- 4.2 The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

5 Safeguarding

- 5.1 We take safeguarding incredibly seriously in upholding our statutory duties and striving to safeguard staff and pupils through a culture of safeguarding in everything we do. We have a Director of Standards and Improvement, and Designated Safeguarding Leads in every academy. Collectively these colleagues work together to implement policy and secure excellence in safeguarding practice across the Trust. These colleagues are incredibly experienced in this area and model excellent practice for all staff. Through their encouragement, each academy proactively works with the local authorities, the local safeguarding partnerships, the LADO and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. The focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.
- 5.2 Every member of staff, whether or not they are based in an academy, is trained on the policy (either in person or via e-learning) and is required to declare annually that they have read and understood the policy and their training. In addition, TDET also has a Whistleblowing Policy which enables those with concerns about any wrongdoing or breaches of law, to raise these concerns in confidence without fear of disciplinary action.
- 5.3 Throughout the year the annual safeguarding training plan across the Trust includes a detailed focus upon on early identification of those at risk of exploitation and training to help all staff know what to do if they become aware of any potential risks. We are fully satisfied that through our robust safeguarding training that staff could identify and act appropriately for at risk pupils, staff and contractors.

5.4 TDET is committed to safe recruitment processes. All staff recruited to work in one of the Trust's academies will be subject to the rigorous recruitment procedures outlined within TDET's Safer Recruitment policy. The importance of safeguarding and protecting children attending our academies is promoted as much as possible throughout the recruitment process to help deter, reject or identify people who might abuse children. In addition, TDET undertakes all relevant statutory vetting checks including criminal record checks (DBS checks), barred list checks and prohibition checks together with right to work and references as well as extensive social media searches.

6 Monitoring and evaluation

6.1 This statement will be reviewed on an annual basis to ensure we remain compliant at all times and there is a consistent focus.