

Modern Slavery Act Statement

Financial Year Ending: 2024/25

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and outlines the steps that the Trust has taken during the financial year to prevent modern slavery and human trafficking within its organisation and supply chains.

The Diocese of Gloucester Academies Trust (DGAT)

DGAT is an Academy Trust operating 24 schools across Gloucestershire. Our purpose is to deliver inclusive, high-quality education and to support the wellbeing of every child and member of staff. We are committed to operating with integrity, transparency, and accountability in all aspects of our work, including our responsibilities under the Modern Slavery Act.

The Trust operates exclusively within the United Kingdom and does not have any overseas business interests or supply chains. Our suppliers include UK-based educational resource providers, facility management services, IT equipment suppliers and catering services, all of which are subject to UK employment laws and regulations. However, we recognise that exploitation can occur within supply chains and employment practices and take our duty to prevent this seriously.

Policies and due diligence

We have a range of policies and procedures in place to support our commitment to ethical conduct and safeguarding. These include:

- **Child Protection and Safeguarding Policy** – ensuring robust procedures to safeguard all children.
- **Safer Recruitment Policy** – ensuring robust vetting procedures for all staff, including identity and right-to-work checks.
- **Pay Policy** - we work closely with the National Joint Council (NJC) for support staff and the School Teachers Pay and Conditions Document for teaching staff to help reduce risk by improving employee working and pay practices. Our central team roles have a five point pay scale in place.
- **Whistleblowing Policy** – providing a clear and confidential process for reporting concerns, including those related to exploitation or abuse.
- **Complaints Policy** – providing a clear and comprehensive way for complaints to be raised, investigated and resolved.
- **Code of Conduct** – setting out expectations for staff and suppliers in acting lawfully and ethically.

Our Audit, Risk and Finance Committee (ARF) has overall oversight of the process and practices embedded within the Trust to reduce Modern Slavery and in ensuring our supply chains, which rely on people, can demonstrate adherence with local and national laws and regulations, including paying the minimum wage.

As part of our due diligence processes, we:

- Seek to evaluate potential risks in our supply chains, particularly in sectors known to have higher exposure to modern slavery (e.g. construction, cleaning, and facilities).

Risk assessment and management

The Trust has undertaken an assessment of where the risk of modern slavery may arise in our operations and supply chains. While the overall risk remains low, we have identified specific areas that warrant closer scrutiny, such as third-party service contracts and outsourced labour.

We will continue to monitor and review these areas as part of our wider risk management framework and ensure that mitigation measures remain appropriate and effective.

Training and awareness

We recognise the importance of staff being able to identify and respond to concerns about modern slavery and exploitation. To support this, we:

- Provide training and guidance to central and school staff involved in procurement, recruitment, and safeguarding. This will be achieved through our regular Headteacher and school finance staff meetings and existing training opportunities e.g. annual Safeguarding updates.
- Include reference to modern slavery and exploitation in relevant staff briefings and updates.
- Ensure that leaders are equipped to promote a culture of vigilance and ethical responsibility.

Future commitments

In the coming year, the Trust will:

- Implement a Procurement Policy which incorporates ethical sourcing principles and requires suppliers to confirm compliance with the Modern Slavery Act.
- Review and refresh staff training materials to maintain awareness of modern slavery risks.

- Strengthen contract management and supplier engagement around ethical labour practices.
- Continue to monitor and update our risk assessment, policies, and due diligence processes.
- Ensure all contracts contain clauses requiring suppliers to comply with the Modern Day Slavery Act 2015.
- Conduct background checks on new suppliers to ensure compliance with modern slavery laws.
- Maintain records of safeguarding, recruitment, and supplier due diligence checks.
- Strengthen supplier compliance and contract management processes to confirm that ethical standards are being upheld.

Effectiveness of measures taken

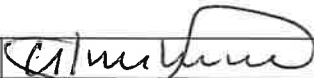
To ensure the effectiveness of the steps we are taking to prevent modern slavery, we:

- Review and update policies annually to ensure alignment with current legislation and best practice.
- Monitor the number and outcomes of safeguarding, whistleblowing, and recruitment concerns raised.
- Keep a record of staff training completion and regularly evaluate the content and reach of training and guidance.

Approval

This statement has been approved by the Trust Board on 6 May 2025 and will be reviewed annually.

Signed on behalf of the Trust Board

Name:	 CRAIG HUXLEY-JONES
Role:	CHAIR OF TRUST BOARD
Date:	20/05/2025

