



Nexus Education Schools Trust

Modern Slavery Statement

Nexus Education Schools Trust is a multi academy (Company number 08753719) with an annual turnover in 2023/24 of £44 million.

Our Trust is committed to:-

- The ethical treatment of all individuals.
- The safeguarding of children, young people, and vulnerable adults.
- The responsible, accountable, and compliant spending of public and charitable funds.

Introduction

This statement sets out Nexus Education Schools Trust (NEST) actions to understand all potential modern slavery risks related to its activity and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. In accordance with to section 54(1) of the Modern Slavery Act 2015

This statement relates to actions and activities during the financial year 1st of September 2023 to 31 August 2024.

NEST 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.

This statement sets out NESTs 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.

Structure, business, and supply chains

Nexus Education Schools Trust (NEST) is a multi-academy trust (MAT), working across four local authorities; Bromley, Kent, Lewisham and Southwark, providing education provision in nursery, primary and special education.

There are 20 member schools, Thames South Teaching School Hub and a NEST nursery, within the organisation.

- Our schools serve approximately 6,500 pupils
- We employ over 900 staff
- All of our operations are based in the UK

NEST has two main areas of operations:

- A national level which oversees the business as a whole;
- A local level – e.g., an individual school.

Risk Management

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact NEST. The first is through matters of a safeguarding nature which covers child sex exploitation or human trafficking which can directly impact our pupils. This also potentially affects the staff of our contractors. The second is our supply chain and the vendors we contract.

As part of our initiative to identify and mitigate risk we have identified the principal areas which carry material risks.

Risk factors for consideration include:

- Country risks – exposure may be greater in global supply chains in countries where protection against breaches of human rights is limited, particularly with regard to rights of foreign contract workers to retain their own ID and papers, and/or where work arrangement by agents is common, etc.
- Sector risks – there are different risks and levels of risk in different sectors. For example, the risks and arrangements which generate bonded labour situations for workers in the extractives sector may differ to those causes in manufacturing.
- Transaction risks – banks or financial institutions may be involved in facilitating financing From or supporting cases of modern slavery and bonded labour in operations or supply chains or through money laundering.
- Business partnership risks – different supplier relationships and business partnerships will all carry different levels of risks. In some cases, existing long-term partnerships will involve less risk because the organisation will have a better knowledge of their partner's operations and policies. However, a new partnership or business relationship may be equally low risk as long as proper due diligence is conducted.

Additionally, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers

Procurement and supply chain

We work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business. 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 business. We act ethically and with integrity in all of our charitable and business relations.

Policies, documentation, and key relationships

The following key policies and documentation detail our approach to protecting our pupils and staff from modern slavery and ensuring our supply chains are free from modern slavery.

- Financial Procedures and Policy;
- Concerns and Complaints Policy;
- Whistleblowing Policy and Procedure;
- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy;
- Child Protection and Safeguarding Policy;
- Code of Conduct;
- Supplier terms and conditions.

In addition, we work closely staff, local authorities and unions to help reduce risk by improving employee working and pay practices.

Our Finance, Audit & Risk Committee (FAR) has overall oversight of the process and practices embedded within NEST 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. The members of the Committee work together with the HR, Pay and Performance Committee (HPP) as appropriate on these areas.

Supply chain

NEST's procurement regulations set out the requirements we have in relation to our engagement with suppliers. 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 (Disclosure & Barring Service) check. We publish our standard terms and conditions to ensure providers looking to contract with us are aware of our standards. Should suppliers fail to meet our minimum requirements, or be unwilling to make any changes, we may cease to trade with them.

Procurement is subject to internal audit review, as well as assessed by our external auditors annually. Frameworks via public sector buying organisations are being considered for all tenders and these meet the requirements of the Modern Slavery Act 2015 by default. In the event we opt not to use an existing framework all tenders go through Head of Procurement at which point the modern slavery risk will be considered and incorporated into the tender evaluation criteria.

Safeguarding

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. Collectively WE work together to implement policy and secure excellence in safeguarding practice across the Trust. Each school proactively works with the local authorities, the local safeguarding partnerships, the LADO (Local Authority Designated Officer) and local stakeholders to combat safeguarding issues, including child sexual exploitation and human trafficking. Their good practice is shared amongst the organisation and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

Training

Every member of staff, whether or not they are based in a school, is trained on our safeguarding policies and is required to declare annually that they have read and understood. In addition, there are other policies which support this statement including the 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.

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.

This is not an area for complacency however and we keep under closely scrutiny and evaluation our safeguarding policy and practice. This enables us to refine and develop excellence in all we do and in this Modern Slavery Statement w

We evaluate our processes for raising concerns to ensure that there are clearly identified ways to report concerns of whistleblowing or modern slavery which are available to all users of our estates.

Goals

The Trust is committed to continually reviewing and improving its practices to ensure modern slavery is in no way a part of its operations. Over the next financial year, we are looking to implement the following control

measures to increase our oversight of ethical procurement and recruitment:

- Delivering statutory training
- Best practice HR in recruitment
- Best practice procurement
- Optimizing the use of Public Sector Buying Organisations

Declaration

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

10 October 2024