



Modern Day Slavery Statement

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Statutory or Best Practice Policy	Best Practice
School or Trust Policy	Trust

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01637 303106 or email info@kernowlearning.co.uk.

Kernow Learning Modern Slavery Statement 2022 – 2024

This statement is made on behalf of Kernow Learning (Company number 07394649) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. This statement relates to actions and activities during the year April 2023 – April 2024.

Kernow Learning recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to preventing slavery and human trafficking within our activities and to ensuring that our supply chains are free from slavery and human trafficking.

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and supply chains.

Structure, business, and supply chains

Kernow Learning (MAT)'s 21 schools are listed on our website [Kernow Learning - Home](#)

We have two main areas of operations:

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

Our suppliers are UK based and key supply areas cover catering, maintenance/repairs, agency staff and cleaning.

Our approach

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.

- Complaints Policy;
- Whistleblowing Policy and Procedure;
- Low Level Concerns Policy;

- Single Central Record (SCR), Personnel Files and Safer Recruitment Policy;
- Child Protection and Safeguarding Policy;
- Code of Conduct;
- Supplier letters of assurance.

Our Audit & Risk Committee has overall oversight of the process and practices embedded within Kernow Learning 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.

Identifying and addressing risks

We recognise as a Trust that there are two main avenues of risk through which modern slavery could impact us. 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.

Supply chain

Kernow Learning's 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 and receiving relevant Safeguarding training. We require written assurance from companies and suppliers that their staff have met the high standards of conduct and safeguarding we expect from our own staff. 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. We have completed a desk-based audit of our key suppliers' statements to reassure ourselves they continue to operate in accordance with the requirements of the act. No areas of risk were identified. We continue to ensure that we support staff in working with existing and new suppliers through training and understanding of our processes embedded in our procurement practices to prevent modern slavery and human trafficking, and fully understand our duty as a Trust as prescribed in legislation namely in the form of e-learning. Safeguarding colleagues also cover modern slavery within their CPD programme.

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. We have a Trust Safeguarding Lead, as well as Designated Safeguarding Leads in every school.

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 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 schools and the focus of safeguarding training always includes detailed training about early identification of those at risk of exploitation.

The quality and impact of our safeguarding practice is reviewed at every level of Trust governance. Safeguarding policy and practice is reviewed via our DSL network. In addition, the Chief Executive Officer meets weekly with the Trust Safeguarding Lead.

Safeguarding is an agenda item at every full Board of Trustees Meeting and at every Local Governing Body meeting. We have a named Trustee with portfolio responsibility for Safeguarding and each Local Governing Body has a nominated Safeguarding governor who is responsible for Safeguarding. We also have a Safeguarding Network for governors.

Our Child Protection and Safeguarding Policy is reviewed annually by the Trust Safeguarding Lead and the Board of Trustees. It is fully compliant with all statutory requirements and guidance set out in Keeping Children Safe in Education (DfE 2022).

Due to the geographical spread of our academies, each academy Designated Safeguarding Lead is required to understand the local safeguarding context.

Key performance indicators to measure effectiveness of steps being taken

Training:

Every member of staff, whether or not they are based in a school, 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, we also have a Whistleblowing Policy and a Low Level Concerns 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 we recognise the impact of the pandemic is not to be underestimated as we continually enhance the knowledge of our staff to prevent slavery and human trafficking and child sexual exploitation. Safeguarding awareness sessions for modern slavery (and trafficking) at school level are included within our staff and governor safeguarding CPD plan. 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.

Reporting

To date, no referrals have been made in relation to modern slavery. Since the date of issue of our previous Modern Slavery Statement approved by the Board of Trustees in the academic year 2022 - 23, there have been no referrals made for child sexual exploitation.