

Modern Slavery and Human Trafficking Policy – August 26

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Purpose, Scope and Principles

AS2Educate is committed to protecting children, young people, employees and everyone connected with our organisation from modern slavery, human trafficking, forced labour and all forms of exploitation.

We recognise that modern slavery is a serious safeguarding issue as well as a criminal offence. We adopt a zero-tolerance approach to all forms of exploitation and are committed to promoting a culture of dignity, respect, inclusion, ethical practice and accountability.

Everyone working with or for AS2Educate has a responsibility to remain vigilant, report concerns and contribute to preventing modern slavery.

What is Modern Slavery?

Modern slavery is an umbrella term used to describe serious criminal offences including:

- slavery;
- servitude;
- forced or compulsory labour;
- debt bondage;
- human trafficking;
- criminal exploitation;
- sexual exploitation;
- domestic servitude; and
- child exploitation.

Modern slavery may involve coercion, intimidation, threats, deception or abuse of vulnerability. Children and young people may be exploited even where they appear to consent to the activity.

Responsibilities

Everyone working for or on behalf of AS2Educate must:

- promote a culture of respect, dignity and inclusion;
- remain alert to indicators of modern slavery, trafficking and exploitation;
- report concerns immediately;
- cooperate with safeguarding enquiries and investigations;
- comply with this Policy and related safeguarding procedures; and
- act professionally and ethically at all times.

The Provision Manager and Senior Leadership Team will:

- promote awareness of modern slavery;
- ensure safeguarding arrangements remain effective;
- undertake appropriate due diligence when engaging suppliers and commissioned providers;
- support staff in responding appropriately to concerns; and
- monitor compliance with this Policy.

The Designated Safeguarding Lead (DSL) and Deputy DSLs are responsible for ensuring concerns relating to children are managed promptly in accordance with statutory safeguarding guidance and local safeguarding arrangements.

Preventing Modern Slavery

AS2Educate is committed to reducing the risk of modern slavery through:

- safer recruitment practices;
- robust safeguarding procedures;
- staff training;
- appropriate supervision;
- ethical procurement;
- supplier due diligence;
- effective whistleblowing arrangements;
- promoting an open and inclusive organisational culture; and
- regular review of safeguarding and organisational risks.

AS2Educate will not knowingly engage with organisations or individuals involved in modern slavery or exploitative practices.

Safeguarding Children and Young People

AS2Educate recognises that children attending Alternative Provision may be particularly vulnerable to exploitation, including:

- child criminal exploitation;
- child sexual exploitation;
- county lines activity;
- forced criminality;
- forced labour;
- trafficking;
- domestic servitude; and
- exploitation linked to missing education or persistent absence.

Staff should remain alert to indicators that may include:

- unexplained absences or repeated missing episodes;
- sudden changes in behaviour;
- fearfulness or anxiety;
- evidence of controlling relationships;
- unexplained movement between locations;
- possession of unexplained money or expensive items;
- poor living conditions;
- lack of control over identification documents;
- unexplained injuries; or
- disclosures suggesting exploitation or coercion.

Staff are not expected to investigate suspected modern slavery or trafficking.

Any safeguarding concern relating to exploitation must be reported immediately to the Designated Safeguarding Lead or Deputy DSL in accordance with AS2Educate's Safeguarding and Child Protection Policy.

Where appropriate, referrals will be made to Children's Social Care, the Police and other safeguarding partners in accordance with local multi-agency safeguarding arrangements.

Supply Chains, Procurement and Third Parties

AS2Educate is committed to conducting its business ethically and expects the same standards from suppliers, contractors, commissioned providers and other third parties.

Where proportionate to the size and nature of the organisation, AS2Educate will:

- undertake appropriate due diligence before engaging suppliers;
- seek assurance that suppliers comply with the Modern Slavery Act 2015;
- include appropriate contractual expectations where necessary;
- review concerns relating to suppliers or commissioned services; and
- terminate business relationships where there is credible evidence of modern slavery or serious unethical practice.

Procurement decisions will be made fairly, transparently and in accordance with the Conflicts of Interest and Declaration of Interests Policy and Anti-Bribery and Corruption Policy.

Reporting Concerns

Anyone who suspects modern slavery, trafficking or exploitation must report their concerns immediately.

Concerns relating to children should be reported to:

- the Designated Safeguarding Lead;
- a Deputy Designated Safeguarding Lead; or
- the Provision Manager.

Concerns relating to employees, suppliers or organisational practices may be reported through line management or in accordance with the Confidential Reporting (Whistleblowing) Policy.

AS2Educate encourages the reporting of genuine concerns and will not tolerate victimisation or retaliation against anyone who raises concerns in good faith.

Responding to Concerns

All concerns will be taken seriously and managed promptly, proportionately and confidentially. Where concerns relate to children, safeguarding procedures will always take precedence.

Depending upon the circumstances, AS2Educate may:

- seek advice from safeguarding partners;
- make referrals to Children's Social Care or the Police;
- notify commissioning Local Authorities where appropriate;
- suspend procurement or contractual arrangements;
- terminate contracts where appropriate; or
- cooperate fully with statutory agencies and criminal investigations.

AS2Educate recognises the importance of multi-agency working and will cooperate fully with safeguarding partners and relevant agencies to protect children and young people from harm.

Training and Awareness

All employees will receive information about modern slavery and exploitation as part of safeguarding induction and ongoing safeguarding training.

Training will include:

- recognising indicators of exploitation;
- child criminal and sexual exploitation;
- county lines;
- trafficking;
- reporting procedures;
- multi-agency safeguarding responsibilities; and
- the role of the Designated Safeguarding Lead.

Training will be updated in line with statutory guidance and organisational need.

Monitoring and Review

This Policy will be reviewed annually or sooner where changes in legislation, statutory guidance or organisational practice require earlier review.

Reviewed by:	Richard Fihosy and Claire Ames
Policy Commencement Date:	17.10.2024
Ratified by:	Provision Manager and DSL
Review:	Annual
Next Review:	Autumn Term 2027
August 2025	Full Policy update
August 26	Full Policy review