

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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Organisation	Reach Education and Employment
Author	Christopher Murray
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1. Policy Statement

The organisation is committed to preventing **modern slavery, human trafficking, servitude, and forced labour** in all areas of its operations. We recognise our responsibility to uphold human rights, safeguard vulnerable individuals, and ensure that our practices, supply chains, and partnerships are free from exploitation.

This policy aligns with the **Modern Slavery Act 2015**, safeguarding legislation, and our internal Safeguarding Policy.

2. Scope

This policy applies to:

- All staff, directors, volunteers, and contractors
- All learners
- All supply chains, procurement activities, and external partnerships
- All subcontracted provision
- All visitors and third-party service providers

3. Definitions

Modern Slavery includes:

- Forced or compulsory labour
- Human trafficking
- Debt bondage
- Domestic servitude
- Exploitation for financial or personal gain

Human Trafficking involves the recruitment, movement, or harbouring of individuals through coercion, deception, or abuse of power for the purpose of exploitation.

4. Legal Framework

This policy is informed by:

- Employment Rights Act 2025
- Modern Slavery Act 2015
- Human Rights Act 1998
- Equality Act 2010

- Keeping Children Safe in Education (KCSIE) (2026)
- Working Together to Safeguard Children
- Prevent Duty Guidance
- FE funding and subcontracting rules

5. Responsibilities

5.1 Governing Body / Board

- Ensures compliance with the Modern Slavery Act
- Approves the annual Modern Slavery Statement

5.2 Senior Leadership Team

- Implements this policy across the organisation
- Ensures staff training and awareness

5.3 Designated Safeguarding Lead (DSL)

- Leads on concerns relating to exploitation
- Works with external agencies where required
- Ensures alignment with the Safeguarding Policy

5.4 Staff

- Report concerns immediately
- Complete mandatory safeguarding training

5.5 Supply Chain Partners

- Must comply with this policy and demonstrate ethical practices

6. Recognising Signs of Modern Slavery

Staff should be alert to indicators such as:

- Signs of physical or psychological abuse
- Fearful or withdrawn behaviour
- Lack of personal identification or documentation
- Someone speaking for the individual
- Poor living conditions
- Working excessive hours

- Limited freedom of movement
- Financial control by another person

Concerns must be reported to the DSL immediately.

7. Reporting Concerns

Any suspicion of modern slavery or trafficking must be reported through:

- The **Designated Safeguarding Lead**
- The **Safeguarding Team**
- External agencies (police, local authority) where appropriate

All concerns will be handled sensitively and in line with safeguarding procedures.

8. Supply Chain and Procurement

The organisation will:

- Conduct due diligence on suppliers
- Require suppliers to confirm compliance with the Modern Slavery Act
- Terminate contracts where modern slavery is identified
- Avoid working with organisations that cannot demonstrate ethical practices

9. Recruitment Practices

We maintain safe and fair recruitment processes, including:

- Right-to-work checks
- Verification of identity
- Reference checks
- Compliance with safer recruitment guidance

We do not charge recruitment fees or use agencies that do.

10. Training and Awareness

All staff will receive training on:

- Recognising signs of exploitation
- Reporting procedures
- Legal responsibilities
- Safeguarding links

Additional training is provided for high-risk roles (e.g., procurement, subcontracting).

11. Monitoring and Review

The organisation will:

- Review this policy annually
- Publish an annual **Modern Slavery Statement**
- Monitor supply chain compliance
- Review safeguarding data for patterns of exploitation
- Report findings to the governing body

This policy links to the Quality Improvement Plan and safeguarding audits.

Modern Slavery and Human Trafficking Statement

Our commitment

Reach Education and Employment is fully committed to protecting people from harm and treating everyone with dignity and respect. We do not tolerate modern slavery or human trafficking in any part of our organisation or in the services we use.

Modern slavery includes forced labour, exploitation, and people being controlled or treated unfairly. As an education provider, we recognise our responsibility to keep people safe, act ethically, and promote a culture where concerns are taken seriously.

Leadership and culture

The Directors take responsibility for ensuring modern slavery risks are understood and managed. We promote a culture where:

- Safeguarding is everyone's responsibility
- Staff feel confident to raise concerns
- Ethical behaviour is expected and modelled

This approach supports Ofsted's expectation that safeguarding is effective, well understood, and part of everyday practice.

Our organisation and risk areas

We provide education and workplace support in Harrogate, within the UK. Direct teaching activity is minimal risk, but we recognise potential risks in some areas of our supply chains, including:

- Cleaning and facilities management
- Catering services
- Construction and maintenance work
- ICT equipment and teaching resources
- Agency, temporary, or contracted staff

We take a proportionate approach to managing these risks.

Policies and procedures

We have clear policies that support safeguarding, fair treatment, and safe working practices, including:

- Modern Slavery and Human Trafficking Policy
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy

These policies are up to date, accessible, and understood by staff.

Safe recruitment and workforce checks

To protect staff, learners, and the wider community, we:

- Follow safer recruitment guidance
- Carry out right-to-work checks
- Ensure staff and agency workers are employed legally
- Pay staff fairly and on time

These actions support Ofsted's expectations around safeguarding, governance, and staff suitability.

Working with suppliers and contractors

We expect suppliers and contractors to meet legal and ethical standards. As part of procurement and contract management, we:

- Ask suppliers to confirm compliance with modern slavery law
- Raise concerns where standards may not be met
- Act if serious concerns are identified

Training and awareness

Staff receive safeguarding training that helps them:

- Understand what modern slavery is
- Recognise signs of exploitation
- Know how to report concerns

Staff working in recruitment, safeguarding, or procurement receive additional guidance relevant to their roles.

Reporting concerns

Anyone connected with Reach Education and Employment can raise concerns safely and confidentially. Concerns can be reported to:

- **The Designated Safeguarding Lead (DSL)**
- **The Executive Directors or designated Whistleblowing Officer (via the formal Whistleblowing Procedure for protected disclosures)**
- **External agencies (Police, Local Authority, or the Modern Slavery Helpline)**

All concerns are recorded, reviewed, and acted upon appropriately.

Monitoring and review

Leaders and governors/trustees monitor safeguarding arrangements, including modern slavery risks. This statement and relevant policies are reviewed regularly to ensure they remain effective and reflect current guidance.