



HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

THIS POLICY APPLIES TO THE HEARTWOOD LEARNING TRUST BOARD, THE CENTRAL TEAM,
AND ALL TRUST SCHOOLS/ACADEMIES

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Policy Updates

| Date | Page | Policy Updates |
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| October 2021 | All | NEW Policy |
| July 2023 | 3 | Introduction changed to 'Statement of Intent' in line with other Trust Policies. |
| July 2023 | 4 | 1 - Legal Framework added in line with other Trust policies |
| July 2023 | 6 | 8 - Monitoring and Review section added in line with other Trust policies |
| November 2023 | Whole policy | Re-formatted and updated inline with new Scheme of Delegation |
| December 2023 | 3 | Statement of Intent expanded inline with current legislation |
| December 2023 | 4 | 2 - New section added to clarify some definitions |
| December 2023 | 4 | 3.2 - 3.3 - Updated background info regarding legislation |
| October 2024 | 3 | Introduction added to include the Trust's Christian Ethos |
| October 2025 | Whole policy | Review completed; no updates required |

Introduction

Heartwood Learning Trust is an inclusive and collaborative Church of England multi-academy trust serving church, community and alternative provision schools. This policy is guided by our Christian ethos and the visions of our Trust and its schools/academies. We share a clear vision – to create schools where children and young people thrive, as we help them prepare to live life in all its fullness (John 10:10).

For us, a place to thrive means much more than a place simply to be comfortable. Instead, our aim is to develop schools and an educational offer which enable each pupil to flourish academically, practically, emotionally, socially and spiritually.

Statement of Intent

Modern slavery is a serious criminal offence under the **Modern Slavery Act 2015** which is a violation of human rights. Victims of modern slavery may be forced, coerced, threatened and/or deceived into situations where they are subjugated, degraded and/or controlled in ways that undermine their personal identity and/or sense of self. Modern slavery encompasses slavery, servitude, human trafficking and forced labour, all of which involve exploitation for personal or commercial gain.

Trustees, Governors and volunteers visiting our schools/academies may witness indicators of modern slavery and come into contact with pupils affected by this. It is important that everyone working in education has an understanding of what modern slavery involves and how it can present, so that they can help identify individuals at risk and take appropriate action.

This document sets out Heartwood Learning Trust's policy in relation to modern slavery with the aim of preventing opportunities for modern slavery to occur within the daily operations of the organisation, and safeguarding any individuals who may be at risk. Individuals affected by modern slavery must be treated with dignity, compassion and respect. In addition to the provision of education, all schools/academies have a responsibility for the care, safety and wellbeing of child victims of modern slavery – this extends to the child dependents of adult victims.

This policy applies to all individuals working for or with Heartwood Learning Trust in any form, including Trustees, Governors, contractors, employees, volunteers and all other associated partners.

This policy underpins our published **Human Trafficking and Modern Slavery Statement**.

1. Legal Framework

- 1.1. This policy has due regard to all relevant legislation and guidance including, but not limited to, the following:
 - Modern Slavery Act (2015)
 - Home Office - Modern Slavery: statutory guidance for England and Wales (October 2023)
- 1.2. This policy operates in conjunction with the following Trust policies and procedures:
 - Safeguarding and Child Protection Policy
 - Equality Policy and Objectives
 - Tendering and Procurement Policy
 - Recruitment and Selection Policy
 - Whistleblowing Policy

2. Definitions

- 2.1. For the purposes of this policy, please see the following terms and how they are defined:
 - **Modern Slavery** - this includes human trafficking, servitude, slavery and forced labour
 - **Human Trafficking** - where a person is 'transferred' in some way into the control of another individual, for the purpose of exploitation
 - **Slavery** - a person(s) consider that they 'own' another person and may involve using the victim as a commodity
 - **Exploitation** - where an individual takes advantage of an imbalance of power to coerce, control, manipulate or deceive another person
 - **County Lines** - refers to the movement of drugs across counties, particularly into rural areas/small towns. This typically involves exploitation of children or young people into moving/storing drugs/money

3. Background

- 3.1. The **Modern Slavery Act 2015** was introduced to specifically address slavery and trafficking in the 21st Century.
- 3.2. The **Modern Slavery Act 2015** introduced provision for victims of modern slavery to have access to sufficient means to defend against prosecution. It also introduced protection, support and certain reparations for victims of modern slavery, and crucially, the duty for public authorities to work with first responder organisations to make referrals where victims of modern slavery have been identified.
- 3.3. This legislation was introduced to significantly enhance support for law enforcement, to provide the tools they need to target today's slave drivers and ensure perpetrators receive suitably severe sentences. It also includes a world leading provision to encourage businesses to take action to help ensure their end-to-end supply chains are slavery free.
- 3.4. The **Modern Slavery Act 2015** includes provisions to:
 - Enable the Secretary of State to make regulations relating to the identification of and support for victims.
 - Make provision for independent child trafficking advocates.
 - Introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators.

- Close gaps in the law to enable law enforcement to stop boats where slaves are suspected of being held or trafficked.
- Require businesses over a certain size and threshold to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply.
- An additional clause (clause 6) was added retrospectively to the act and requires organisations to report on the processes and due diligence taken to ensure that their supply chains are slavery free. The **Transparency in Supply Chains** clause came into force in October 2015 and requires organisations with a turnover of £36 million or more to produce and publish a slavery and human trafficking statement each financial year.

4. Indicators of Modern Slavery in Children

- 4.1. Child victims of modern slavery are typically reluctant to disclose information about their situation, as they are often forced to lie using stories invented by the perpetrator(s). It is also possible for the perpetrator to manipulate the child's thinking or perspective (e.g. instilling a distrust of authorities, to keep them from disclosing information).
- 4.2. The school/academy will look out for any child-specific indicators of modern slavery in the school/academy setting. These may include:
 - Feeling intimidated/appearing to be scared or anxious around authority figures
 - Behaving in an age-inappropriate way, e.g. in an oversexualised manner
 - Having no friends their own age
 - Having restricted access to education/missing education
 - Travelling unaccompanied or without a responsible adult
 - Eating apart from other pupils
 - Unusual travel arrangements for getting to/from school, often with adults who are not their relatives
 - Showing an unwillingness to explain their whereabouts
 - Acquiring money, electronics, articles of clothing and gifts, for example, that cannot be explained
 - Displaying changes to their behaviour, wellbeing and/or the vocabulary they use
 - Developing associations and relationships with older individuals or groups, e.g. gangs
 - Carrying weapons
 - Exhibiting a significant decline in their academic performance
 - Being under the influence of drugs and/or alcohol
 - Displaying evidence of assault, including sexual assault

5. Our Approach

- 5.1. Our principal activities are the provision of primary and secondary education.
- 5.2. **Heartwood Learning Trust** has a zero tolerance approach to any form of modern slavery and trafficking. We are committed to acting ethically, with integrity and transparency in all business dealings and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and deter modern slavery.

- 5.3. We are therefore well placed to make a positive contribution to preventing opportunities for modern slavery to occur within our business and our supply chain.

6. Ensuring Compliance with the Modern Slavery Act

Procurement and supply chain

- 6.1. We are committed to ensuring that there is transparency in our organisation and our approach to tackling modern slavery is consistent with our obligations under the **Modern Slavery Act 2015**. We expect the same high standards from all of our contractors, suppliers and other associated partners. We are developing our procurement and contracting processes to include specific prohibitions against the use of forced, compulsory and trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
- 6.2. The highest risk to our organisation of falling foul of the **Modern Slavery Act** is through our procurement of goods and services. Whilst we cannot 100% guarantee supplier adherence with the requirements of the **Modern Slavery Act** we will endeavour to reduce and/or eliminate the risks as much as possible.
- 6.3. We will do this by ensuring that our procurement processes, supplier code of conduct and contractual terms include specific provision relating to the **Modern Slavery Act**.

Responding to modern slavery and trafficking within our supply chain

- 6.4. If a Heartwood Learning Trust employee suspects that modern slavery and/or trafficking may be occurring within our supply chain, in the first instance concerns should immediately be raised with the **Chief Operating Officer (COO)** of the Trust.
- 6.5. The **COO** of the Trust should then:
- Call the police on 999 in an emergency and;
 - Contact the Gangmasters Licensing Authority (GLA) on 0845 602 5020 or email: intelligence@gla.gsi.gov.uk.
 - When contacting the authorities the reporting manager will need to be clear about the circumstances and why it is considered that it is a case of modern slavery/human trafficking.

Education services

- 6.6. Many of our employees come into contact with members of the public. In doing so there is the possibility that they could encounter somebody believed to be at risk of modern slavery and/or trafficking. Whilst there is no typical victim, statistics show that the risk is higher amongst the most vulnerable, ethnic minorities or socially-excluded groups.

Responding to modern slavery and trafficking:

- 6.7. Modern Slavery and trafficking are both forms of abuse and therefore our safeguarding policies and procedures must be followed whenever an employee suspects that someone is at risk. In accordance with our safeguarding policies you should always call the Police on **999** in an emergency.
- 6.8. All frontline employees receive safeguarding children training which incorporates modern slavery. These employees have an individual responsibility for ensuring that they are familiar with the signs and indicators and that they are aware of our safeguarding policies and procedures so that they are able to respond appropriately. **Line Managers** must ensure that safeguarding training is kept up to date. Safeguarding is everyone's responsibility.

7. Breaches of this Policy

7.1. Heartwood Learning Trust employees:

- All employees are expected to act in accordance with this policy to minimise the risk of modern slavery and trafficking.
- Any member of staff found to be wilfully neglectful in responding to concerns may face disciplinary action.

7.2. Suppliers, contractors and external partners:

- In addition to reporting breaches to the appropriate authorities as outlined in section 6.5 - **Heartwood Learning Trust** reserves the right to terminate the contract/partnership where a supplier, contractor or external partner has been found to be in breach of the **Modern Slavery Act**.

7.3. If any employee feels Heartwood Learning Trust is not meeting its obligations under the Modern Slavery Act:

- If an employee is concerned that either **Heartwood Learning Trust** or an individual is not meeting their obligations in relation to this policy, in the first instance they should raise the concern with their **Line Manager**, or **Principal**. If this is not appropriate, for example if the concern involves your **Line Manager** or **Principal** then concerns can be raised via our **Whistleblowing Policy**.

8. Communication and Awareness of this Policy

8.1. Our zero-tolerance to modern slavery will be communicated:

- To all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate.
- We will also launch this policy through team briefings.

9. Further Information and Advice

- Heartwood Learning Trust: 01904 560053
- Home Office website <https://www.gov.uk/government/collections/modern-slavery>
- Modern Slavery website <https://www.modernslaveryhelpline.org/report>
- Modern Slavery helpline: 08000 127700

10. Monitoring and Review

- 10.1. The approver of this policy and the next scheduled review date is shown on the cover page of this document.