



Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is a hidden crime in which people are exploited for criminal gain and a violation of fundamental human rights. It takes the form of:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

There were an estimated 40 million people in slavery globally in 2016 and 10,000 –13,000 potential victims in the UK, however many victims are not identified or reported. The common factors are that a victim is, or is intended to be, used or exploited for someone else's (usually financial) gain, without respect for their human rights. The perpetrators seeking to take advantage of them could be private individuals, running small businesses or part of a wider organised crime network. At The Dell, we consider our exposure to slavery/human trafficking to be very limited.

For adult victims, there will be some element of coercion involved, such as threats, use of force, deception, or abuse of power. For example, perpetrators may:

- Find out personal information about the victim and then use threats against their family in order to manipulate and control the victim.
- Use the victim's fears about their immigration status to control them.
- Deceive them with false promises of legitimate jobs.

There are many more examples. Victims may appear to give consent, but in reality, they have little ability to choose leave the exploitative situation and the perpetrators have still committed a crime.

Child victims and vulnerable adults are not able to give informed consent and therefore exploitation even without any element of coercion could constitute modern slavery.

Our Commitment

We are committed to ensuring there is awareness of, and transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Section 54(1) of the Modern Slavery Act 2015.

Supply Chains

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect all those in our supply chain and contractors to comply with our values. The School's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware and construction

Indicators of a Potential Victim May Include:

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post-traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else

- Lack of access to medical care
- Limited social contact/isolation
- Limited contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated, or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities
- Unwanted/underage pregnancy
- Inappropriate sexual behaviour
- Incoherent/changing account of events
- Repeating a story that you have heard elsewhere
- Unexplained eagerness to leave a safe space/to work
- Sexually transmitted diseases
- Missing episodes (especially from care – under 18s)
- Limited/sporadic school attendance (under 18s)

Measures

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage.
- Ensure minimum employment age adhered to, in line with the relevant legislation.
- Always apply national minimum wage thresholds, in line with the relevant legislation.
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

Safeguarding

Looking after children and ensuring their safety in and out of school is our key priority. We will enact our safeguarding processes whenever we have a concern about a child, carer or family member who may be the victim of slavery or trafficking.

Training

All staff are required to read, understand and comply with the school's Anti-Slavery and Human Trafficking Policy. Training is also provided for all staff which is updated every two years.

Whistleblowing

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Resources

More information on modern slavery and human trafficking can be found on the National Crime Agency website and at <https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>