



**European Union**

European  
Social Fund



Education & Skills  
Funding Agency



# Modern Slavery Policy



---

## 1. Introduction

Skills People Group consists of the following companies.

- *Construction Skills People*
- *C&G Assessments and Training Ltd*
- *Training Futures UK Ltd.*

In compliance with section 54 of the Modern Slavery Act 2015, the company understands that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The company is committed to ensuring there is transparency within the business and in its approach to tackling modern slavery throughout our supply chain. The company expect the same high standards from all our contractors, suppliers and other business partners we work with. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

## 2. Scope

This policy applies to all persons working for the company or on behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

The company have a zero-tolerance approach to modern slavery and are committed to acting ethically and integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

## 3. Aim

The company aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn to be mistaken. The company are committed to ensuring no one suffers any detrimental treatment because 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 part of our supply chain.

## 4. The Law

Under UK legislation, all modern slavery offences are punishable by a maximum sentence of life imprisonment.

Where victims of modern slavery have been forced into committing a crime by the perpetrators, UK legislation provides that those victims may have a defence against prosecution.

**England and Wales** - The Modern Slavery Act 2015 consolidated existing slavery and trafficking offences into two offences:

- **Human Trafficking**, defined as “arranging or facilitating the travel of another person with a view to exploitation”. Travel includes within a country, not just across international borders.
- **Slavery, servitude and forced or compulsory labour** – the Act states that this offence has the ‘same meaning’ as for the purposes of Article 4 of the European Convention on Human Rights.

---

## 5. Modern Day Slavery

Modern Slavery is a serious crime. **It encompasses Slavery, Servitude, and Forced or Compulsory Labour and Human Trafficking.**

Modern Slavery victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation. A person is trafficked if they are brought to (or moved around) a country by others who threaten, frighten, hurt and force them to do work or other things they don't want to do.

## 6. Types and Signs of Modern Slavery

The prevalence of different types of modern slavery in the UK will vary by region and change over time, however currently there **are four broad ways** in which perpetrators may seek to exploit victims, which the Home Office research has further broken down into distinct types:

### 6a Labour Exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions or excessive wage deductions, but is not solely about this. In order to constitute modern slavery, there will also be some form of coercion meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person, an offence can be committed without the element of coercion.

#### Types of Labour Exploitation:

- **Victims exploited for multiple purposes in isolated environments** – Victims who are often involves the grooming of children and transporting them for the purposes of sexual exploitation, although the offending is carried out by one individual.
- **Victims work for offenders** - Victims are forced to work directly for offenders in businesses or sites that they own or control (some offenders may be gangmasters). The main method of exploitation is not paying or illegally underpaying victims.
- **Victims work for someone other than offenders** - Victims are employed in a legitimate and often low-skilled job, with legal working conditions, by an employer unrelated to the offenders. Most or all wages are taken by offenders often through control of the victims' bank accounts.

#### The following signs could indicate a situation of Labour Exploitation:

- *Individuals may show signs of psychological or physical abuse. They might appear frightened, withdrawn or confused*
- *Workers may not have free movement and may always be accompanied*
- *Individuals often lack protective equipment or suitable clothing and have not been trained to safely fulfil the requirements of the role*
- *The person may not have access to their own documents, such as ID or their passport, with the employer having confiscated them*
- *Individuals may not have a contract and may not be paid National Minimum Wage or not paid at all*
- *Workers are forced to stay in accommodation provided by the employer. This accommodation could be overcrowded*
- *Individuals could live on site*
- *Workers could be transported to and from work, potentially with multiple people in one vehicle*
- *The person might not accept money or be afraid to accept payment*
- *Workers may work particularly long hours*

---

## 6b Domestic Servitude

Domestic servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

### Types of Domestic Servitude:

- **Exploited by partner** - Victims are forced to undertake household chores for their partner and often their partner's relatives. If married, the marriage may have been arranged or forced and the servitude often occurs alongside domestic abuse and sexual exploitation.
- **Exploited by relatives** - Victims live with and exploited for household chores and childcare by family members, usually extended family. Many victims are children.
- **Exploiters not related to victims** - Victims live with offenders who are often strangers. Victims are forced to undertake household chores and are mostly confined to the house.

### The following signs could indicate a situation of Domestic Servitude:

- *The individual may be held in their employer's home and forced to carry out domestic tasks such as providing childcare, cooking and cleaning*
- *The individual may not be able to leave the house on their own, or their movements could be monitored*
- *The person may work in excess of normal working hours*
- *The individual may not have access to their own belongings, including their ID, but also items such as their mobile phone, which can isolate them*
- *The employer may be abusive, both physically and verbally*
- *The person may not interact often with the family they are employed by*
- *The person may be deprived of their own personal living space, food, water or medical care*
- *The individual may stand out from other family members, noticeable as they may wear poorer quality clothing*

## 6c Criminal Exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pickpocketing, entering into a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming.

Forced removal and trafficking of human organs is an additional category of modern slavery that occurs globally, however there have been no confirmed cases in the UK.

### Types of Criminal Exploitation:

- **Forced gang-related criminality** - *Victims are forced to undertake gang related criminal activities, most commonly relating to drug networks. Victims are often children who are forced by gangs to transport drugs and money to and from urban areas to suburban areas and market and coastal towns.*
- **Forced labour in illegal activities** - *Victims are forced to provide labour to offenders for illegal purposes. The most common example is victims forced to cultivate cannabis in private residences.*
- **Forced acquisitive crime** - *Victims are forced by offenders to carry out acquisitive crimes such as shoplifting and pickpocketing. Offenders may provide food and accommodation to victims but rarely pay them.*

- **Forced begging** - *Victims are transported by offenders to locations to beg on the streets for money, which is then taken by offenders. Victims are often children vulnerable adults.*
- **Trafficking for forced sham marriage** - *Traffickers transport EU national victims to the UK and sell these victims to an exploiter in a one-off transaction. Exploiters marry victims to gain immigration advantages and often sexually abuse them.*
- **Financial fraud (including benefit fraud)** - *Victims are exploited financially; most commonly their identity documents are taken and used to claim benefits. This type often occurs alongside other types*

**The following signs could indicate a situation of Sexual Exploitation:**

- *A large group of adult or children beggars might be moved daily to different locations but return to the same location every night. This could indicate forced begging*
- *An individual might be transported to or from the scene of a crime, including shoplifting, pickpocketing or forced begging*
- *An individual may not benefit from the money or items they have obtained through the crimes they have been forced to commit*
- *A person may be forced to cultivate cannabis with their freedom of movement restricted; including being locked in a room. It is common that the individual may not be able to speak English, or have a limited vocabulary*
- *A vulnerable person may be forced or manipulated out of their home by drug dealers who use the home as a base to sell drugs*
- *Young people may be forced to transport and sell drugs across county borders, which is known as 'County Lines. You can read more about this [here](#)*

**6d Sexual Exploitation**

Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment or moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are more commonly female but can also be male.

**Types of Sexual Exploitation:**

- **Child sexual exploitation – group exploitation** - Children are sexually exploited by groups of offenders. This is usually for personal gratification, but sometimes the exploitation involves forced sex work in fixed or changing locations and will include characteristics of types 9 and 10. Offenders frequently transport victims to different locations to abuse them.
- **Child sexual exploitation – single exploiter** - Often involves the grooming of children and transporting them for the purposes of sexual exploitation, although the offending is carried out by one individual.
- **Forced sex work in fixed location** - Victims are trafficked and exploited in established locations set up specifically for sex work. This can include brothels or rooms in legitimate business premises (e.g. massage parlour).
- **Forced sex work in changing location** - Victims are forced into sex work where the location of exploitation frequently changes. Locations include streets, clients' residence, hotels or 'pop-up' brothels in short-term rented property. Victims are frequently advertised online.
- **Trafficking for personal gratification** - Victims are trafficked to residential sites controlled by offenders and sexually exploited for the offenders' own gratification. Some victims may be confined to the site for a long period of time.

---

## The following signs could indicate a situation of Sexual Exploitation:

- The child may have mood swings, including being angry, upset or withdrawn
- The child may show signs of inappropriate sexual behaviour
- They may be dressed inappropriately for their age
- The child may go missing at night or weekends and may not be clear about their whereabouts
- They may not attend school
- The child may have gifts, presents or expensive items which they cannot explain
- You can read more about young people at risk of exploitation, including the forms of child exploitation, the signs to look for and what you can do to prevent it on this specific child exploitation page. <https://www.modernslaveryhelpline.org/about/spot-the-signs>

Further information visit:

<http://www.legislation.gov.uk/ukpga/2015/30/contents>

## 7. Modern Slavery Support

If you are unsure about whether the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with a member of the safeguarding team. Unless you believe a person is being trafficked and is in immediate danger, you should call 999 straight away.

- The Salvation Army is contracted by the UK Government to provide support to potential victims of modern slavery/human trafficking in England and Wales. The Salvation Army provides specialist support for all adult victims of modern slavery in England and Wales. Their confidential referral helpline 0300 303 8151 is available 24/7  
<https://www.salvationarmy.org.uk/modern-slavery>
- If you believe a person is being trafficked and **is in immediate danger**, you should call 999 straight away
- You can also report suspicions of trafficking by calling 101 or visiting your local police station.
- Modern Slavery Helpline: 08000 121 700
- File a report online <https://www.modernslaveryhelpline.org/report>
- Get further advice <https://www.modernslaveryhelpline.org/information/victims>

Immediately notify a member of the safeguarding team if you:

- Have any concerns about any issue of suspicion of modern slavery.
- Believe or suspect that a conflict with this policy has occurred or may occur in the future.

<b>Designated Safeguarding Lead (Strategic Lead)</b> Sacha McCarthy; Head of Quality & Performance Tel: 01246 589 444 Mobile: 07976 744 655	<b>Deputy Designated Safeguarding Lead</b> Sarah Booth, HR Assistant Tel: 01246 589 509 Mobile: 07872 989 368
<b>Safeguarding Officer</b> Kelly Kirk – Academy Manager Nottingham Tel: 01246 589444 Mobile: 07495 681 473	<b>Safeguarding Officer</b> Chris Clark – Academy Manager Sheffield Tel: 01246 589444 Mobile: 07855 720 008

---

## 8. Communication and Awareness

This policy is provided to staff during their induction and further updates communicated as and when the policy is updated.

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given when needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 9. Responsibility for the Policy

Management at all levels have the responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any necessary training.

## 10. Right to Access Information

Individuals have the right to access personal data that is being held about them either on computer or in manual files. An individual who wishes to exercise this right is required to submit a subject access request to The Data Protection Officer.

## 11. Policy Breaches

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 12. Monitoring

This policy will be reviewed annually by the designated safeguarding lead and/or deputy lead in line with changes or new legislation and/or regulations.

Any questions or concerns about the operation of this policy, or if you consider that this policy has not been followed, you should raise the matter with the designated safeguarding lead or deputy lead.

## 13. Related Policies

- Safeguarding and Prevent Policy
- Whistle Blowing Policy
- Equality and Diversity Policy
- Complaints Policy

## Document Control

Date of change	Version	Overview of amendment	Amended by / Job title	Approved by	Approval date
19-03-18	1	Policy created	Sharon Lawrence / Julie Lawton (Quality Manager)	Director	19-03-18
21-12-18	2	Full policy revision and restructure: to include, The Law, Modern Slavery types, reporting concerns to the safeguarding team, monitoring and rights to access information.	Julie Lawton (Quality Manager)	T Armstrong	21-12-18
25-02-2020	3	<ul style="list-style-type: none"> <li>Section 1 Introduction has been split into Introduction, Scope and Aim</li> <li><b>Section 6</b> (pages 3-7) the types of slavery have been expanded on and the signs have been included.</li> <li><b>Section 7</b> (pages 6-7) Support information / links have been added and the Safeguarding Team updated to include the officers at the Skills Academies.</li> <li><b>Section 12</b> (page 7) monitoring and updating the policy is completed by the Safeguarding Lead or Deputy.</li> <li><b>Section 13</b> (page 8) related policies included.</li> </ul>	Julie Lawton (Deputy Safeguarding Lead / Quality Manager)	Amanda Warham (Safeguarding Lead) and SMT	02-03-2020
17.12.20	4	<b>Section 7:</b> Contact and support details amended (page 6)	Sacha McCarthy (Head of Quality & Performance)	SMT	17.12.20