



Anti-Slavery & Anti-Child Trafficking Policy Statement

Introduction

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This policy statement defines Debut's commitment to ensuring that human trafficking and slavery does not exist within its own business, but also details how the company will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship. Debut will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, subcontractors and/or business partners (collectively by it 'Suppliers'). All suppliers are therefore required to adhere to the following.

This policy applies to all persons working for Debut Training Academy or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Legal Framework

The Modern Slavery Act 2015

The act came into effect from October 2015. Debut is committed to a work and learning environment that is free from human trafficking, forced labour and unlawful child labour (collectively 'human trafficking and slavery'). Debut believes that it has a responsibility for promoting ethical and lawful employment practices.

Debut will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it knowingly accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

This policy sets out the high standards of behaviour and integrity that Debut requires from its employees in relation to the Modern Slavery Act 2015 to prevent slavery and human trafficking. Debut also requires its suppliers and contractors to respect and follow this policy statement as a core term of any contracts that they may have with any member organisation or business supply chains.

Definitions

Human Trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.



Harmful Child Labour: Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Debut have a zero-tolerance approach to modern slavery in our organisation and our supply chains and our commitment extends to the code of conduct points below:

- ensuring a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business by providing training to relevant staff;
- paying all staff at least the minimum wage rate applicable;
- complying with all legislation, importantly the Immigration Act 2015;
- striving to build long standing relationships with our suppliers & sub-contractors;
- ensuring that all employees are made aware of their individual obligations in respect of modern slavery & human trafficking;
- encouraging the reporting of concerns and the protection of whistle blowers, by way of our Whistleblowing Policy;
- ensuring that all staff, including temporary workers, have a written contract of employment;
- operating a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will;
- ensuring all staff know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to;
- using indicative pricing statistics to assess fees from agencies offering or charging suspiciously low rates; and
- ensuring compliance of this policy through management meetings, site visits, internal & external audits and questionnaires.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Responsibility and Authority

The organisation has ultimate responsibility for learner protection and will ensure that matters relating to anti-slavery and anti-trafficking are dealt with promptly and with the robustness it should expect including whistleblowing notifications.

As such a senior member of staff has been designated as first point of contact and they are:

Linda Edwards

Safeguarding Officer

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Learner Knowledge

Debut ensures that it embeds safeguarding, child slavery/trafficking throughout a learner's programme and will also evaluate learning has taken place by means of a workshop or focus session, questioning, practical assessments, review questions, learner questionnaires and completion of a in class task. We also make apprentices aware that they should know who the designated in workplace safeguarding person is (usually their main supervisor/manager) so they know who to go to for any matters.

Please refer to Debut's linked policies below for additional information regarding Safeguarding Standards:

- Anti-Bullying, Anti-Harassment and Victimisation Policy
- Code of Conduct – Learner Policy
- Complaints Policy
- Counselling Policy
- Confidentiality and Disclosure Policy
- Data Protection/Privacy Policy
- Employer (Work Based) Support & Expectation Policy
- Equal Opportunities & Inclusion Policy
- Freedom of Information Policy
- Guidance Policy
- Health & Safety Policy
- Health & Wellbeing Policy
- Induction Procedure – Learners Policy
- Internal Quality Assurance (IQA) Policy
- Learner Support & Super Group Policy
- Learner Positive Behaviour Management Policy
- Learner Contribution & Learner Voice Policy
- Meetings Policy
- Mentoring – Learner Policy
- Prevent Policy
- Safer Recruitment Policy
- Whistle Blowing Policy

Policy Revision

Issue 02- Updated January 2022

Revision Date – January 2023