

2023
V3

Anti-Slavery & Anti- Child Trafficking Policy

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.

Why does Debut need to have this policy?

A clear and comprehensive anti-slavery policy can be key to:

1. Build trust with customers - customers may have their own responsibilities and requirements in relation to modern slavery. This could include ensuring that its own supply chain has appropriate anti-slavery policies and procedures in place. Having an anti-slavery policy in place can therefore build trust with customers and demonstrate you meet their own anti-slavery requirements.
2. Ensure legal compliance - some businesses are legally required to complete a modern slavery statement to comply with the Modern Slavery Act 2015 (see more on this in the question below). Part of this statement must set out the policies relating to slavery and human trafficking that the business has in place, so having an anti-slavery policy can be crucial.
3. Protect brand reputation - an anti-slavery policy can enhance your brand reputation by showing you act ethically and responsibly as a business. An anti-slavery policy can help mitigate risks associated with negative publicity and potential legal issues related to breaches of modern slavery laws.
4. Optimise supply chain resilience - a focus on anti-slavery and human trafficking encourages a more transparent and resilient supply chain. By undertaking due diligence on supplies to understand their anti-slavery measures, you will know your supply chain better which allows you to identify potential risks and vulnerabilities, helping you make informed decisions to ensure the continuity of supply.

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.

Modern slavery is a crime and a violation of fundamental human rights. This 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 in order to exploit them for personal or commercial gain.

Modern Slavery - Statistics

Modern slavery is all around us, often hidden in plain sight. People can become enslaved making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or nannies. Victims of modern slavery might face violence or threats, be forced into inescapable debt, or have their passport taken away and face being threatened with deportation.

Many people have fallen into this trap because they were trying to escape poverty or insecurity, improve their lives and support their families. Now, they can't leave.

According to the latest [Global Estimates of Modern Slavery \(2022\)](#) from Walk Free, the International Labour Organisation and the International Organisation for Migration:

- 49.6 million people live in modern slavery – in forced labour and forced marriage
- Roughly a quarter of all victims of modern slavery are children
- 22 million people are in forced marriages. Two out of five of these people were children
- Of the 27.6 million people trapped in forced labour, 17.3 million are in forced labour exploitation in the private economy, 6.3 million are in commercial sexual exploitation, and nearly 4 million are in forced labour imposed by state authorities
- The Covid-19 pandemic has exacerbated the conditions that lead to modern slavery
- Migrant workers are particularly vulnerable to forced labour.

Types of Slavery Today

- **Human trafficking.** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal
- **Forced labour.** Any work or services people are forced to do against their will, usually under threat of punishment
- **Debt bondage/bonded labour.** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt
- **Descent-based slavery** (where people are born into slavery). A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line.
- **Child slavery.** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery

- **Forced and early marriage.** When someone is married against their will and cannot leave. Most child marriages can be considered slavery
- **Domestic servitude.** Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

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

Designated Safeguarding Lead

01268 560552

linda@debutacademy.com

Kersti Harding

Safeguarding Deputy

01268 560552

kersti@debutacademy.com

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
- Health & Safety Policy
- Health & Wellbeing Policy
- Induction Procedure – Learners Policy
- Learner Support & Super Group Policy
- Learner Positive Behaviour Management Policy
- Learner Contribution & Learner Voice Policy
- Mentoring – Learner Policy
- Prevent Policy
- Safer Recruitment Policy
- Whistle Blowing Policy

Policy Revision

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