



Modern Slavery & Exploitation Policy

Approved by:
The Directors of Strive Alternative Provision

Signed on behalf of the Directors by:
Stacey Hickey, Head of Operations

Date Approved: June 2026
Review Date: June 2027

Policy Update Summary (2026)

- New standalone policy created to meet safeguarding and due diligence requirements
- Covers modern slavery, human trafficking, child exploitation and vulnerable adult exploitation
- Aligned with KCSIE 2025 and Working Together 2023
- Includes reporting procedures and safeguarding responsibilities
- Added Monitoring & Review and Version Control sections

Legal & Statutory Framework

This policy is informed by:

- Modern Slavery Act 2015
- Children Act 1989 & 2004
- Children and Families Act 2014
- Care Act 2014
- Human Rights Act 1998
- Equality Act 2010
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (KCSIE) 2025
- UK GDPR & Data Protection Act 2018
- Buckinghamshire Local Authority Alternative Provision Quality Assurance Requirements

1. Policy Statement

Strive Alternative Provision is committed to safeguarding and promoting the welfare of all students and vulnerable adults. We recognise that modern slavery, human trafficking and exploitation are serious safeguarding concerns which can affect children, young people and adults from any background.

Strive has a zero-tolerance approach to all forms of modern slavery and exploitation and is committed to identifying concerns, responding appropriately and working with partner agencies to safeguard those at risk.

2. Scope

This policy applies to:

- All employees

- Directors
- Contractors and subcontractors
- Volunteers
- Agency staff
- Students and vulnerable adults accessing Provision services

This policy should be read alongside the Provision's:

- Safeguarding & Child Protection Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Behaviour Management Policy
- Safer Recruitment Policy

3. Definitions

Modern Slavery

Modern slavery is an umbrella term used to describe situations where an individual is exploited and unable to leave due to threats, coercion, abuse of power or deception.

Modern slavery may include:

- Human trafficking
- Forced labour
- Debt bondage
- Domestic servitude
- Criminal exploitation
- Sexual exploitation

Human Trafficking

Human trafficking involves recruiting, transporting, transferring, harbouring or receiving individuals for the purpose of exploitation.

Child Criminal Exploitation (CCE)

CCE occurs where a child is manipulated, coerced or deceived into criminal activity for the benefit of another individual or group.

This may include:

- County Lines activity
- Drug distribution
- Theft
- Violence
- Financial exploitation

Child Sexual Exploitation (CSE)

CSE is a form of child abuse where a child is manipulated or coerced into sexual activity in exchange for something they need or want, or for the benefit of another person.

Vulnerable Adult Exploitation

Strive recognises that vulnerable adults may also be at risk of sexual exploitation. Sexual exploitation may occur through coercion, manipulation, grooming, abuse of power, financial dependency, threats or intimidation. Staff working with post-16 students and vulnerable adults must remain alert to indicators of exploitation and report concerns immediately through safeguarding procedures.

Adults with care and support needs may be vulnerable to:

- Financial exploitation
- Criminal exploitation
- Sexual exploitation
- Forced labour
- Coercive control

4. Recognising Indicators of Exploitation

Staff should remain vigilant to signs that a student or vulnerable adult may be at risk.

Possible indicators include:

- Going missing from home, school or provision
- Unexplained absences
- Sudden changes in behaviour or presentation
- Possession of unexplained money, gifts or expensive items
- Frequent association with older individuals or groups
- Evidence of controlling or coercive relationships
- Unexplained injuries
- Fear, anxiety or withdrawn behaviour

- Reluctance to discuss activities outside provision
- Use of multiple mobile phones or unexplained devices
- Concerns relating to online exploitation
- Signs of neglect, abuse or trafficking

The presence of one indicator alone does not necessarily mean exploitation is occurring; however, concerns should always be explored appropriately.

5. Staff Responsibilities

All staff are responsible for:

- Remaining alert to signs of exploitation
- Following safeguarding procedures
- Recording concerns promptly and accurately
- Reporting concerns to a Designated Safeguarding Lead (DSL)
- Maintaining professional curiosity
- Completing safeguarding training as required

Staff must never investigate concerns independently.

6. Responding to Concerns

Where exploitation is suspected:

1. Ensure immediate safety where possible.
2. Record factual observations and disclosures.
3. Report concerns immediately to a DSL.
4. Preserve any evidence where appropriate.
5. Follow safeguarding procedures and professional advice.

Concerns should be treated as safeguarding matters and responded to without delay.

7. Safeguarding and Reporting

The DSL will assess concerns and determine appropriate action.

This may include referral to:

- Buckinghamshire MASH
- Children's Social Care

- Adult Social Care
- Police
- National Referral Mechanism (NRM)
- Local Authority Designated Officer (LADO), where appropriate
- Other relevant safeguarding agencies

Where there is immediate risk of harm, emergency services should be contacted without delay.

8. Recruitment and Supply Chains

Strive is committed to ensuring that:

- Recruitment processes comply with safer recruitment principles
- Right to work checks are completed where required
- Staff are recruited lawfully and ethically
- Contractors and suppliers operate lawfully and ethically

Any concerns relating to modern slavery within the workforce or supply chain should be reported through safeguarding procedures or the Whistleblowing Policy.

9. Confidentiality and Information Sharing

Information relating to modern slavery and exploitation concerns will be handled in accordance with:

- UK GDPR
- Data Protection Act 2018
- Safeguarding legislation and guidance

Information will only be shared where there is a lawful basis to do so and where it is necessary to safeguard an individual or prevent harm.

10. Training and Awareness

Staff will receive safeguarding training appropriate to their role.

Training may include:

- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines

- Human trafficking
- Modern slavery
- Online exploitation
- Vulnerable adult safeguarding

Staff are expected to remain aware of emerging safeguarding risks and trends.

END OF POLICY

MONITORING & REVIEW

This policy will be reviewed annually, or sooner if required due to changes in legislation, statutory guidance, local authority requirements, or significant operational changes. The Head of Operations is responsible for ensuring timely review and for communicating updates to all staff.

Version Control

Version	Date	Changes Made	Approved By
2025.1	July 2025	Full rewrite and update to 2025 legislation	Directors of Strive AP
2026.1	June 2026	Updates for due diligence	Directors of Strive AP