



Education & Skills  
Funding Agency



European Union  
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# Modern Slavery Policy

## 1. Introduction

Wildes Education is committed to understanding all potential modern slavery risks to its business and to ensuring the business and its supply chains are free of modern slavery.

In compliance with section 54 of the Modern Slavery Act 2015, the company understands that modern slavery is a serious crime and a violation of fundamental human rights. Modern Slavery can occur in various forms, including trafficking of people, forced labour and servitude 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.

## 2. Aim

Wildes Education are committed to acting ethically and with integrity within 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.

Wildes Education 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 ensure that no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery is or maybe taking place in any part of the business or within our supply chain.

## 3. Scope

This policy applies to all persons working for the company or on behalf in any capacity, including contractors, external consultants, and business partners.

## 4. About Modern-Day Slavery

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

Modern slavery is all around us, but often just out of sight. People can become entrapped 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 can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim. From the outside, it can look like a normal job. But people are being controlled – they can face violence or threats, be forced into inescapable debt, or have had their passport taken away and are being threatened with deportation. Many have fallen into this oppressive trap simply because they were trying to escape poverty or insecurity, improve their lives and support their families. Now, they can't leave.

Source <https://www.met.police.uk/advice/advice-and-information/ms/modern-slavery/>  
<https://www.antislavery.org/slavery-today/modern-slavery/>

**Modern Slavery is a serious crime. It encompasses:**

- Human trafficking.
- Slavery, servitude, and forced or compulsory labour.

Source modern slavery statutory guidance – GOV.UK

## 4a. Types of slavery

Types of modern slavery include:

- **Human trafficking** – adults and children are traded so they can be exploited by others for commercial gain. Find out more about [human trafficking](#).
- **Forced labour** – victims are forced to work against their will, often working very long hours for little or no pay in dire conditions under verbal or physical threats of violence to them or their families. It can happen in many sectors of the economy.
- **Sexual exploitation** – victims are pressurised to perform non-consensual or abusive sexual acts, such as prostitution, escort work and pornography. Women and children make up the majority of victims, but men can also be affected.
- **Criminal exploitation** – often controlled and maltreated, victims are forced into crimes such as cannabis cultivation or pickpocketing against their will. They might also have their benefits taken over by their exploiter.
- **Organ harvesting** – the illegal removal of a person's internal organs which can then be sold.

Source <https://www.met.police.uk/advice/advice-and-information/ms/modern-slavery/>

## 4b. General signs of modern slavery

Common signs that someone may be exploited are:

- Isolation
- Restricted freedom of movement
- Reluctance to seek help
- Physical appearance
- Poor living conditions
- Unusual travel arrangements

Source <https://www.unseenuk.org/about-modern-slavery/spot-the-signs/>

## 5. Reporting

### Wildes Education Safeguarding Team

- Designated Safeguarding Lead is Sharon Lawrence: Tel: 07385 089040.
- Deputy Safeguarding Lead is Julie Lawton Tel: 07810 091 084.
- Safeguarding Officer is Leah Cook Tel: 07570 900 102
- Safeguarding email: [safeguarding@wildeseducation.co.uk](mailto:safeguarding@wildeseducation.co.uk)
- Office 0114 228 8588
- **Always call 999 if there is a crime in action or immediate threat to life.** If you have a hearing or speech impairment, use our textphone service 18000 or text us on 999 if you've pre-registered with the [emergencySMS service](#).

- To report a suspicion or seek advice you can contact the Modern Slavery Helpline confidentially on [08000 121 700](tel:08000121700). This is open 24 hours a day, 365 days a year.
- You can [report modern slavery online](#) or call us on [101](tel:101) at any time to report an incident. If you have a hearing or speech impairment, use our textphone service on 18001 101.
- Should you wish to remain anonymous you can contact Crimestoppers on [0800 555 111](tel:0800555111).
- Salvation Army support all adult victims of modern slavery in England and Wales. Their confidential helpline 0800 808 3733 is available 24/7.

## **6. Responsibility and monitoring of this policy**

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.

Managers are responsible for ensuring those reporting to them understand and comply with this policy.

All staff have a responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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

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.

## **7. Right to Access Information**

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

## Document Control

Date of Change	Version	Overview of amendment	Amended by / Job Title	Approval by and Date
04/01/2018	1	Policy created	Susanna Mather	Director of Apprenticeships
05/10/2020	2	Full policy review and annual update	Julie Lawton Quality & Compliance Mgr.	S Lawrence 8/10/20 Director of Education
22/10/2021	3	Annual review	Julie Lawton Quality & Compliance Mgr.	S Lawrence 25/10/21 Director of Education