



## Modern Slavery Policy

### **Modern slavery and human trafficking statement**

Bespoke Learning Ltd recognises that modern slavery is often a hidden crime. 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 in order to exploit them for personal or commercial gain.

Bespoke Learning Ltd is committed to improving its practices to combat slavery and human trafficking.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and forms Bespoke Learning Ltd.'s slavery and human trafficking policy.

Bespoke Learning Ltd is a provider of alternative provision in the education sector. Dawn Griffiths, Director of Bespoke Learning Ltd is committed to ensuring that there is no modern slavery or human trafficking in supply chains or in any part of the business.

In light of the obligation to report on measures to ensure that all parts of Bespoke Learning Ltd.'s business and supply chain are slavery free, Dawn Griffiths has reviewed the company's policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Bespoke Learning Ltd.'s policies and procedures demonstrate its commitment to acting ethically and with integrity in all business relationships, and to implementing and enforcing systems and controls to ensure slavery and human trafficking is not taking place anywhere in the business.

### **Indicators of Modern Slavery**

Teachers of Bespoke Learning Ltd. should be familiar with the common indicators of modern slavery in order to support and identify potential victims; however, it can be challenging to identify potential victims in practice as victims may be reluctant to come forward, may not even realise that they are victims, or feel compelled to lie about their circumstances or omit certain information.

Common indicators of potential victims may include physical, psychological and situational indicators; these may also be in combination. While the indicators listed in this section are applicable to both adults and children (particularly where a child is of working age), there are also indicators that are specific to children, which are important for schools to know about. Examples of each category of indicator are outlined below.

## **Physical indicators**

Many victims of modern slavery are at risk of suffering from acts of physical abuse, sexual abuse, neglect, exploitation and degradation – sometimes this is ongoing throughout the victim's experience. Physical indicators include the following:

- Presenting with unexplained injuries
- Presenting with injuries that have gone untreated or partially untreated
- Evidence of captivity and neglect, e.g. poor hygiene and general condition
- Being malnourished
- Having severe vitamin deficiencies
- Having dental problems
- Presenting with abdominal pain or other gastrointestinal issues, e.g. where illegal substances have been stored internally and ruptured
- Losing weight
- Self-harming
- Attempting suicide
- Presenting with disfigurements, e.g. cutting, burning or branding
- Undergoing cosmetic procedures that have been forced on them
- Experiencing post-operative pain, e.g. from organ harvesting

**Psychological indicators** Victims of modern slavery are also at risk of developing and exhibiting mental health issues as a result of abuse and/or trauma. Victims may also suffer from sleep deprivation, malnutrition and vitamin deficiencies that can affect both their physical and mental wellbeing. Psychological indicators include the following:

- Expressing fear or anxiety
- Being depressed • Feeling hopeless and apathetic
- Isolating themselves
- Displaying attachment issues, e.g. overdependence
- Displaying identity issues
- Showing difficulty trusting others
- Displaying a loss of autonomy, e.g. difficulty making simple decisions
- Having gaps in their memory
- Showing changes in their mood

- Becoming hostile or aggressive
- Having difficulty concentrating
- Thinking suicidal thoughts
- Having intense feelings of guilt and shame
- Having low self-esteem

### **Child-specific indicators**

Having no or restricted access to their parents

- Appearing intimidated
- Behaving in a way that does not correspond with behaviour typical of children their own age, e.g. in an oversexualised manner
- Having a history of underage sexual activity
- Having no friends their own age
- Having restricted access to education
- Having no time for playing
- Living apart from other children
- Living in substandard accommodation
- Eating apart from other members of their household
- Being given only leftovers to eat
- Being engaged in work that is not suitable for children
- Travelling unaccompanied by adults
- Travelling in groups of persons who are not their relatives
- Wearing clothing that is not appropriate for children

### **Process for slavery and human trafficking**

Teachers who may work on behalf of Bespoke Learning Ltd know to follow the safeguarding policy and report any concerns about the welfare of young people and vulnerable adults to Dawn Griffiths, Designated Safeguarding Lead (DSL). The DSL will consult with the **BCP** LADO on 01202 817600 or email [LADO@bcpcouncil.gov.uk](mailto:LADO@bcpcouncil.gov.uk). If the concern is regarding a vulnerable adult, then the DSL will consult Adult Safeguarding concerns on 01202 123654 or email [asc.contactcentre@bcpcouncil.gov.uk](mailto:asc.contactcentre@bcpcouncil.gov.uk)



Referral form to BCP LADO Service:

<https://www.bcpCouncil.gov.uk/Children-young-people-and-families/LADO/Docs/LADO-Referral-Form.pdf>

If the concern is regarding a **Dorset** young person or vulnerable adult, then Dawn Griffiths will contact the Children's Advice and Duty Service ChAD on 01305 228866 or email [eastlocality@dorsetcouncil.gov.uk](mailto:eastlocality@dorsetcouncil.gov.uk)

As part of Bespoke Learning Ltd's initiative to identify and mitigate risk there are systems in place to:

- identify and assess potential risk
- mitigate the risk of slavery and human trafficking affecting the young people Bespoke Learning Ltd are educating and supporting.
- ensure a high standard of safeguarding is adhered to and teachers are vigilant as to the potential risk of slavery or trafficking.
- protect whistle blowers.

## Training

To ensure an understanding of the risks and the identification of modern slavery and human trafficking within Bespoke Learning Ltd, teachers are provided with relevant safeguarding training.

<https://bournemouth-poole-lscb.org.uk/child-exploitation/child-victims-of-trafficking-and-modern-slavery/>

<https://www.antislavery.org/slavery-today/spot-the-signs-of-slavery/>

## Policy review

This policy was created on 19.12.2019 and reviewed on 03.09.2020 by Dawn Griffiths, Director of Bespoke Learning Ltd.

This policy was reviewed and amended with the addition of the Dorset Lado contact details on 04.01.2021

This policy was reviewed and the telephone numbers of BCP Lado and Dorset Lado were updated on 14.02.22

This policy was reviewed on 23.04.23 with:

- the email address of BCP Lado
- the addition of the link for BCP referral form
- amendment of telephone number of Dorset's ChAD



- the addition of the email address for East Dorset ChAD

This policy was reviewed on 18.05.24 with no amendments.

This policy was reviewed and updated on 22.05.25 with the addition of 'Indicators of modern Slavery' including child specific indicators. Next review 22.05.26.