

Modern Slavery, Human Trafficking and Labour Exploitation Policy

Recruitment, Adult Skills Provision and Supply-Chain Assurance | Version 2.0

Policy field	Current position
Provider	Quack Recruitment & Training Ltd
Applies to	Directors, employees, agency workers, contractors, learners, applicants, suppliers, subcontractors, employer partners, venues and delivery partners.
Policy owner	Jessica Roughton – Quality & Compliance Lead and Designated Safeguarding Lead
Senior accountable lead	Dion Bishop – Managing Director
Operational leads	Designated Safeguarding Lead, Deputy DSL, managers, recruitment and employer-engagement staff, finance/procurement staff and contract owners.
Approved records and systems	Safeguarding Concern Form and safeguarding log; supplier and employer due-diligence records; contracts; recruitment/worker records; training records; PICS and learner files; whistleblowing records; risk and action registers.
Reporting route	Immediate danger: 999. Internal safeguarding route: DSL, Deputy DSL or safeguarding@quackrecruitmentandtraining.co.uk . Alternative route: Whistleblowing Policy, Safeguarding Governor or Managing Director where appropriate.
Approval and review	Approved August 2026. Next scheduled review August 2027, or sooner after an incident, material change in law, procurement guidance, business model, supplier risk or organisational structure.
Policy intent Quack will take proportionate and practical steps to prevent, identify and respond to modern slavery, human trafficking and labour exploitation in its recruitment activity, training provision, employer relationships and supply chain. The priority is the safety and remedy of affected people, not merely contractual or reputational protection.	

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1. Purpose and Policy Intent

This policy establishes Quack's arrangements for preventing, identifying, reporting and responding to modern slavery, human trafficking, forced or compulsory labour, servitude, debt bondage and related labour exploitation. It replaces the 2021 document, which was framed as a historic Group statement for the year ending December 2020 and referred to former locations, business activity and workforce information.

Modern slavery is frequently hidden. An individual may not identify themselves as a victim, may appear to have agreed to elements of their working arrangements, or may fear authorities, employers, recruiters, family members or other controllers. Staff do not need proof before raising a concern. They must record facts, protect the person and follow the safeguarding route.

Current statutory position

Section 54 of the Modern Slavery Act 2015 requires qualifying commercial organisations with annual turnover of £36 million or more to publish an annual statement. Quack does not currently consider itself within that threshold, but the Managing Director must verify applicability annually and after any material group or turnover change. This policy is maintained voluntarily and because public contracts and customers may require equivalent assurance from suppliers of any size.

2. Scope and Organisational Context

The policy applies to Quack Recruitment & Training Ltd and to activity undertaken in its name, including adult Skills Bootcamp delivery, learner recruitment and progression, recruitment and staffing services, employer engagement, purchasing, subcontracting, venue use, assessment and qualification delivery, and any labour supplied or introduced to clients.

Risk interface	How risk may arise in Quack's work
Recruitment and staffing	Deceptive recruitment; worker-paid fees; third-party control; withheld wages or identity documents; coerced transport/accommodation; unexplained shared bank or contact details; inability to leave an assignment.
Adult skills and learners	A learner may disclose exploitation, be controlled by another person, be pressured into work, experience unsafe accommodation, debt, financial abuse, criminal exploitation or workplace coercion.
Employer and progression activity	Learners may progress into sectors with labour-intensive, temporary or agency work. Employer evidence or job outcomes must not conceal exploitative conditions.
Supply chain and procurement	Risks may arise through labour providers, subcontractors, cleaning, catering, security, transport, construction-related goods/services, electronics, workwear, facilities, venues or overseas manufacturing.
Internal employment	Risk includes unlawful retention of documents, coercion, threats, forced overtime, discriminatory dependence, unauthorised deductions, or restrictions on leaving employment.

3. Legal, Procurement, Funding and Safeguarding Context

Framework / requirement	Application to Quack
Modern Slavery Act 2015	Creates offences relating to slavery, servitude, forced or compulsory labour and human trafficking. Section 54 sets annual transparency requirements for qualifying commercial organisations.
Section 54 regulations and Home Office guidance	The current turnover threshold is £36 million. In-scope organisations publish annually, normally within six months of financial year end, obtain board approval, secure a director signature and place a prominent website link.
Care Act 2014 and adult safeguarding	Modern slavery is a form of abuse. Concerns about an adult with care and support needs who may be unable to protect themselves must be considered through local safeguarding procedures.
National Referral Mechanism guidance	Only designated First Responder Organisations can submit NRM or Duty to Notify referrals. Adults must give informed consent for an NRM referral; children do not. Quack will work with police, local authorities, the Fair Work Agency or another authorised First Responder.
Procurement Act 2023 and PPN 009	Modern-slavery offences can affect supplier exclusion. Public procurement guidance promotes risk-based supply-chain mapping, due diligence, training and victim-centred remediation, proportionate to supplier size and risk.
Employment, agency and wage law	Recruitment and employment practices must be lawful, transparent and free from coercion, worker-paid recruitment fees, unlawful deductions and restrictions on freedom to leave.
Public funding and commissioner contracts	Quack may be required to warrant that modern slavery is not present in its operations or supply chain, conduct due diligence, flow obligations to subcontractors and notify material concerns.

Framework / requirement	Application to Quack
UK GDPR and Data Protection Act 2018	Sensitive safeguarding, worker and supplier information must be collected and shared lawfully, securely, proportionately and on a need-to-know basis.
Proportionate application Quack will not create unnecessary administrative burdens for low-risk small suppliers. Due diligence will focus on risk to workers: sector, workforce model, recruitment method, location, subcontracting, temporary labour, accommodation, payment arrangements and the severity of potential harm.	

4. Definitions

Term	Meaning for this policy
Modern slavery	An umbrella term covering human trafficking, slavery, servitude and forced or compulsory labour.
Human trafficking	Recruiting, transporting, transferring, harbouring or receiving a person through coercion, deception, abuse of power or vulnerability for exploitation. Movement may be domestic or cross-border.
Forced or compulsory labour	Work or service exacted under threat of penalty where the person has not offered themselves voluntarily or cannot freely leave.
Servitude / slavery	Severe control in which a person's freedom is significantly restricted and powers similar to ownership or enduring coercion are exercised.
Debt bondage	Work demanded to repay a debt where terms, deductions or duration are unfair, manipulated or impossible to discharge.
Labour exploitation	Abuse of a worker for another's benefit. Poor practice does not always meet the legal threshold for modern slavery, but may still require safeguarding, employment-law or enforcement action.
Child	A person under 18. A child cannot consent to exploitation and does not need to consent to an NRM referral by a designated First Responder.
Victim / survivor	A person who may have experienced exploitation. Quack will use person-centred language and will not require the individual to adopt a particular label.
First Responder Organisation	An organisation authorised to refer a potential victim into the NRM, including police, local authorities, the Fair Work Agency and specified non-governmental organisations.
Remediation	Action to stop harm, protect the person, restore rights or money, improve working arrangements, obtain specialist support and prevent recurrence.

5. Policy Principles

- No form of slavery, trafficking, forced labour, servitude, child labour, worker-paid recruitment fee, document confiscation or coercive labour practice is acceptable in Quack's operations or business relationships.
- The welfare, wishes and safety of the affected person are central. Commercial inconvenience, funding targets, employer relationships or reputational concerns must not override safeguarding.
- A concern is not proof. Indicators must be considered objectively, without discrimination based on nationality, immigration status, language, ethnicity, housing, shared contact details or type of work.
- Right-to-work and identity checks do not establish that a person is free from exploitation. They are separate legal controls.
- Quack will not charge workers or learners for securing work, require payment to an intermediary, or knowingly allow a third party to control wages, identification, movement or access to support.
- Original identity documents may be viewed or copied only where lawful and necessary. They must be returned immediately and never retained as security.
- People must be free to leave employment or assignments subject only to lawful contractual notice, and must not be threatened, penalised or reported to controllers for doing so.
- Good-faith reporters and affected people will be protected from retaliation. Confidentiality will be maintained as far as possible, but cannot be promised absolutely where safety or legal duties require sharing.
- Where a supplier or employer problem is identified, Quack will prioritise stopping harm and remedying worker impact. Immediate termination is not an automatic response if it would worsen risk, although suspension or termination may be necessary in serious cases.

6. Risk Assessment and Priorities

The Quality & Compliance Lead and contract owners will maintain a proportionate modern-slavery risk assessment. It will be reviewed at least annually and when Quack enters a new sector, appoints a labour provider or subcontractor, changes supplier location, receives a concern, undertakes significant recruitment activity, or identifies a pattern through safeguarding, whistleblowing, payroll, employer or learner data.

Risk factor	Higher-risk characteristics	Expected response
Sector	Construction, logistics, warehousing, cleaning, catering, hospitality, care, manufacturing, agriculture, security or other labour-intensive activity.	Enhanced employer/supplier questions; worker contact; contract clauses; risk owner and review date.
Workforce	Temporary, agency, migrant, low-paid, isolated, home-based, seasonal, night-shift or heavily subcontracted labour.	Check recruitment route, pay, deductions, accommodation, transport, freedom to leave and grievance access.
Recruitment model	Third-party agents, labour intermediaries, overseas recruitment, fees, loans, tied accommodation or transport.	No worker-paid fees; identify intermediaries; written terms; direct worker verification; refuse or escalate unexplained arrangements.
Payment/contact patterns	Multiple workers sharing a bank account, phone, email, address, transport or emergency contact; unusual cash arrangements.	Treat as an indicator only; undertake respectful confidential checks and record legitimate explanations.
Supplier chain	Multiple tiers, opaque ownership, unknown labour source, high-risk location, poor audit access or refusal to answer.	Supply-chain mapping; questionnaire; evidence; enhanced contractual controls; monitoring or alternative supplier.
Behavioural indicators	Fear, rehearsed answers, controller present, reluctance to speak alone, inability to retain pay, threats, unexplained injuries or sudden disengagement.	Immediate safeguarding review; private conversation where safe; do not confront suspected controller; consider police/local authority referral.

7. Recruitment and Employment-Business Controls

7.1 Ethical recruitment

- Workers receive clear information about the role, employer/client, location, hours, pay, deductions, assignment status, notice and who to contact with concerns.
- Quack will not charge a worker a fee for work-finding services or accept arrangements in which an undisclosed third party charges, indebts or controls the worker.
- Recruitment agents, introducers and labour suppliers must be approved and subject to risk-based due diligence. Informal intermediaries must not be used to bypass controls.
- Interviews and onboarding should include direct communication with the worker and, where risk indicates, an opportunity to speak privately without an employer, family member, transport provider or other controller.
- Bank details, contact details and addresses are checked proportionately. Shared details may be legitimate and must not be treated as wrongdoing without further evidence.
- Quack will not hold passports, identity cards, visas, bank cards or original qualifications. Copies are retained only where lawful and securely controlled.
- Pay and deductions must be transparent. Staff must escalate unusual deductions, withheld pay, unexplained cash payments, third-party wage control or requests to divert wages.

7.2 Freedom, dignity and workplace treatment

Workers must be free from threats, intimidation, violence, harassment, compulsory overtime, unsafe accommodation, movement restrictions and retaliation for raising concerns or leaving an assignment. Where Quack supplies or introduces workers, client expectations and worker feedback must be monitored proportionately throughout the relationship.

8. Learner, Employer and Progression Controls

Stage	Required control
Enrolment and induction	Explain safeguarding routes, confidentiality limits, worker rights, how to report exploitation and that training or job support is not conditional on paying a fee to Quack or an employer.
Attendance and engagement	Sudden absence, changed contact details, another person answering communications, unexplained relocation, fear or inability to attend independently may trigger welfare and DSL review.
Employer engagement	Use risk-based checks for employers offering interviews, placements or jobs, particularly in labour-intensive sectors or where labour is supplied through another agency/intermediary.
Job and MS3 evidence	Confirm the employment is genuine and consider whether pay, hours, deductions, duties, location and working arrangements indicate exploitation. Funding evidence must not be accepted if the role appears unsafe, coercive or fabricated.
Learner disclosure	Listen, avoid detailed investigative questioning, establish immediate safety, record exact facts and words, ask what help the learner wants and escalate to the DSL the same working day.
Support and progression	Offer practical signposting and reasonable flexibility. Do not withdraw training or progression support merely because a learner reports exploitation or leaves an unsafe job.

Safeguarding interface

Modern slavery concerns about learners are safeguarding concerns. Staff must use the current Safeguarding Concern Form and the 5 Rs: Recognise, Respond, Record, Report and Refer. Funding, attendance or achievement processes must not delay the safeguarding response.

9. Supplier, Subcontractor and Venue Due Diligence

Due diligence will be proportionate to the risk and leverage available. Low-risk routine suppliers may be covered by standard terms and screening. Higher-risk labour, sector, geography or subcontracting arrangements require enhanced evidence and contract management.

Stage	Minimum requirement	Enhanced controls where risk is higher
Pre-appointment	Identity, ownership, service, location, labour model, relevant convictions/exclusions, policy/statement where applicable, acceptance of Quack requirements.	Supply-chain map, workforce profile, recruitment-fee declaration, subcontractor list, worker grievance arrangements, evidence of pay and working-time controls.
Contracting	Modern-slavery compliance clause; duty to notify; audit/information rights; prohibition on forced labour, child labour, fees and document retention; flow-down to relevant subcontractors.	Corrective-action plan, worker access, termination/suspension rights, remediation obligations and named senior owner.
Monitoring	Review performance, complaints, safeguarding concerns, worker feedback, material subcontracting and changes to ownership/location.	Site visit, independent evidence, direct worker engagement, questionnaire refresh, sample payroll/recruitment review or external assurance.
Concern identified	Protect people, preserve evidence, assess immediate risk and contact the supplier at an appropriate level without alerting a suspected perpetrator.	Suspend new referrals or payments where necessary; agree remediation; notify public customer; involve police/local authority/FWA; terminate only after assessing victim impact and severity.

- Suppliers must not subcontract labour or material parts of a service without required approval where this would materially change modern-slavery risk.
- Quack will avoid purchasing practices that create unreasonable time, price or volume pressure likely to drive exploitation or unlawful labour practices.
- A supplier's published statement is evidence of transparency, not proof that its supply chain is risk-free. Due diligence must consider actual controls and risk.
- Refusal to provide proportionate information, unexplained inconsistencies or retaliation against workers are material red flags.

10. Recognising Possible Indicators

Indicator group	Examples
Control and communication	Another person speaks for the individual, holds their phone/documents, controls transport, prevents private contact, monitors them or gives rehearsed answers.
Work and pay	No written terms, unpaid or underpaid work, unexplained deductions, wages paid to another person, excessive hours, no rest, unsafe work, threats for refusing shifts or inability to leave.
Recruitment and debt	Fees, loans, inflated travel/accommodation charges, debt to an agent, deception about role/pay/location or threats linked to repayment.
Living conditions	Overcrowding, tied or unsafe accommodation, restricted movement, sleeping at work, being moved frequently or employer/controller access to living space.
Behaviour and wellbeing	Fear, anxiety, withdrawal, distrust, malnutrition, untreated injury, exhaustion, inconsistent story, limited knowledge of address or sudden loss of contact.
Documents and identity	No access to passport, ID, bank card or immigration documents; multiple records controlled by the same person; documents that appear altered or supplied by an intermediary.
Criminal exploitation	Forced theft, begging, drug cultivation/transport, benefit fraud, financial-account misuse or threats against the person or family.
Children or young people	Adult control, unexplained money/items, missing episodes, unsafe work, school/training disengagement or travel/accommodation inconsistent with their age.

No single indicator proves modern slavery, and some indicators have innocent explanations. Staff should look at the overall pattern, ask limited open questions, record facts and seek DSL advice rather than attempting to decide the legal offence themselves.

11. Reporting and Immediate Safeguarding Response

Situation	Required action	Timing
Immediate danger, violence, confinement or urgent medical risk	Call 999. Do not confront a suspected controller. Move to a safer place only where this can be done without increasing danger. Alert the DSL as soon as possible.	Immediately
Potential modern slavery affecting a learner, worker or applicant	Listen calmly; do not promise secrecy; establish immediate safety and location; record exact words and observable facts; submit Safeguarding Concern Form.	Same working day
Concern about supplier, employer or subcontractor	Preserve evidence; notify DSL and senior accountable lead; consider worker contact, contract hold, public-customer notification and external referral without tipping off a suspected perpetrator.	Immediately or same working day according to risk
Concern involving the DSL	Report to Deputy DSL and Safeguarding Governor. If unavailable or conflicted, use Managing Director or external whistleblowing/police/local-authority route.	Same working day

Situation	Required action	Timing
Concern involving a senior leader or family-connected person	Use the Whistleblowing and Conflict of Interest policies; assign an unconflicted decision-maker or external adviser where reasonably practicable.	Without delay
Anonymous or uncertain information	Record and assess it. Lack of a named reporter or certainty is not a reason to ignore a credible risk.	Within one working day
Do not investigate at first contact Staff should not conduct a detailed interview, confront an alleged perpetrator, arrange a covert rescue, promise a particular outcome or contact family/employer without a safeguarding assessment. The initial task is safety, factual recording and prompt escalation.		

12. National Referral Mechanism and External Referrals

Quack is not a designated First Responder Organisation and must not represent that it can submit an NRM or Duty to Notify referral directly. The DSL will work with an authorised First Responder such as the police, local authority, Fair Work Agency or an approved specialist organisation.

Person / position	Referral position
Adult who consents	The First Responder explains the NRM, support and possible outcomes and obtains informed consent before submitting the referral. Quack may support the adult and provide factual information with appropriate consent or another lawful basis.
Adult who does not consent	Quack will respect the decision unless another safeguarding or legal basis requires information sharing. A specified public authority may have a Duty to Notify and can submit a non-consensual notification through the official process.
Child or possible child	Safeguard immediately and contact children's social care/police through the DSL. A child does not need to consent to NRM referral by a designated First Responder.
Immediate crime or danger	Call 999. For non-emergency suspected crime use police 101 or another current official route. Safeguarding and NRM processes can proceed alongside a criminal investigation.
Employment-rights concern below modern-slavery threshold	Consider the Fair Work Agency, ACAS, local authority, police, funder/commissioner or specialist advice according to the issue. Exploitation that falls below the NRM threshold must still be addressed.

13. Investigation, Remediation and Commercial Response

13.1 Internal review

Where the immediate safeguarding response is stable, Quack will appoint an unconflicted case lead to establish scope, preserve records, assess affected people and contracts, identify external notification duties and coordinate corrective action. Internal review must not obstruct police, local-authority, First Responder or regulator activity.

- Preserve recruitment records, payroll/payment data, worker and learner communications, supplier files, contracts, system logs, due-diligence evidence, CCTV where lawful, and the original safeguarding record.
- Limit access to the case on a need-to-know basis and avoid unnecessary sharing of immigration, health, family, financial or location information.
- Consider whether one concern indicates a wider population risk involving other learners, workers, sites, shifts, employers, suppliers or subcontractors.
- Do not make immigration status, willingness to support prosecution or certainty of evidence a condition of safeguarding support.
- Coordinate with external authorities before interviewing witnesses or contacting a supplier where this could increase danger, destroy evidence or alert a perpetrator.

13.2 Remediation

Potential harm	Possible remedy
Withheld wages or unlawful deductions	Support recovery, correct payroll, stop deductions, preserve evidence and notify the appropriate authority/customer.
Worker-paid recruitment fee or debt	Require repayment or other remedy, cease the arrangement, remove the intermediary and review all affected workers.
Retained documents or restricted movement	Secure safe return/access through appropriate authorities; do not expose the person to retaliation.
Unsafe assignment or accommodation	Remove or suspend referral where safe, arrange support/signposting and require corrective action before further use.
Supplier control failure	Action plan, enhanced monitoring, worker engagement, suspension, alternative sourcing or termination according to severity and victim impact.

Potential harm	Possible remedy
Learner impact	Safeguarding support, reasonable flexibility, re-engagement, alternative employer support, correction of funding/progression records and protection from disadvantage.
Systemic weakness	Root-cause review, policy/process change, staff training, contract amendment, wider sample and effectiveness check.
Victim-centred commercial decisions Ending a contract immediately may remove visibility or income and worsen risk to workers. Quack will consider safety, leverage, remediation and authoritative advice. Serious criminality, continuing danger, concealment or refusal to cooperate may require immediate suspension, termination and external reporting.	

14. Training, Communication and Worker Voice

Audience	Minimum learning / communication	Frequency
All staff	Modern-slavery definition and indicators; safeguarding route; confidentiality; non-confrontation; exact recording; whistleblowing and non-retaliation.	Induction and annual safeguarding refresher; after material policy change.
Recruitment and employer-engagement staff	Ethical recruitment, worker-paid fees, document control, shared-detail indicators, direct worker verification, pay/deduction concerns and employer due diligence.	Induction; annual refresher; role coaching after incidents or trends.
DSL, DDSL and safeguarding leaders	Trauma-informed response, adult consent, child referral, NRM/First Responder routes, lawful information sharing and local safeguarding pathways.	Role-specific training and updates appropriate to safeguarding responsibilities.
Procurement, finance and contract owners	Risk assessment, supplier mapping, contractual clauses, due diligence, payment controls, remediation and commissioner notification.	On appointment; annual update; before high-risk procurement.
Learners and workers	How to report concerns, right to speak privately, no fees for Quack work-finding, freedom from coercion, safeguarding and whistleblowing routes.	At induction/onboarding and through accessible reminders.
Suppliers and employers	Policy expectations, notification requirement, worker protection, audit/information rights and consequences of non-compliance.	At onboarding/contracting and when requirements change.

Training completion and policy acknowledgement will be recorded. Staff confidence will be tested through safeguarding scenarios, supervision, file sampling or management discussion rather than relying only on completion certificates.

15. Records, Monitoring, Assurance and Annual Statement

Assurance activity	Evidence	Frequency / owner
Legal applicability check	Turnover/group review and decision on whether section 54 applies.	Annually after financial year end – Managing Director/finance.
Risk assessment	Modern-slavery risk register covering recruitment, learners, employers, suppliers, locations, workforce and subcontracting.	At least annually and on trigger – Quality & Compliance Lead.
High-risk due diligence	Questionnaires, evidence, contract clauses, worker/employer contact and action closure.	Before appointment and during contract – contract owner.
Recruitment assurance	Sample of worker files, fees, terms, bank/contact patterns, deductions and worker feedback.	Risk-based and after concerns – recruitment lead/Quality.
Safeguarding trend review	Number/type of concerns, response times, referrals, outcomes and recurring indicators.	Monthly DSL review; quarterly governance report.
Training compliance	Induction/refresher completion, scenario testing and overdue action.	Monthly/quarterly monitoring – Quality/DSL.
Statement and publication	If legally or contractually required, board-approved director-signed annual statement, website publication and registry consideration.	Normally within six months of financial year end.
Policy effectiveness	Actions completed, worker/learner remedy, supplier improvement, recurrence and audit findings.	After every case and at annual review.

This policy is not itself Quack's annual transparency statement. If Quack elects or is required to publish a statement, it must accurately describe the steps actually taken in the relevant financial year, including limitations and planned improvement. It must not repeat historic claims that are no longer evidenced.

16. Roles and Responsibilities

Role	Key responsibilities	Evidence
Managing Director	Senior accountability; annual section 54 applicability check; resources; approval of high-risk response and any public statement; commissioner/customer notification where required.	Approval record, legal applicability review, governance minutes, signed statement.
Quality & Compliance Lead / DSL	Policy ownership; risk register; safeguarding triage; referral coordination; training; trend review; assurance and QIP actions.	Safeguarding log, risk assessment, training records, reports, action plan.
Deputy DSL	Receives concerns, acts when DSL unavailable/conflicted, supports referral and case review.	Concern records, referral notes, supervision and handover.

Role	Key responsibilities	Evidence
Managers and contract owners	Apply due diligence and contractual controls; monitor suppliers/employers; protect reporters; escalate red flags and close actions.	Supplier file, contracts, review notes, corrective actions.
Recruitment and employer-engagement staff	Ethical recruitment, transparent terms, direct worker contact, no fees, indicator recognition, employer checks and immediate reporting.	Worker/employer records, call notes, due-diligence checklist, concern form.
Tutors, learner-engagement and support staff	Explain reporting routes, notice changes in engagement/welfare, listen and record disclosures, report same working day.	Induction records, contact notes, safeguarding form.
Finance/procurement staff	Supplier screening, payment/deduction red flags, bank controls, contract terms and evidence retention.	Supplier approval, invoices, verification and risk flags.
All staff, contractors and learners	Comply with the policy, avoid retaliation, report concerns promptly and preserve confidentiality/evidence.	Acknowledgement, training, reports and cooperation with reviews.
Safeguarding Governor / independent adviser	Provides challenge and alternative oversight for serious, senior-leader or conflicted cases.	Review notes, assurance report and action tracking.

Appendix A: Modern Slavery Indicator Checklist

Check area	Questions to consider	Record / action
Immediate safety	Is anyone in danger, confined, injured, threatened or unable to leave? Is the suspected controller nearby?	Call 999 where required; safe location; DSL alerted.
Freedom and control	Can the person speak alone, keep their phone/ID, choose transport/accommodation, leave work and contact family/support?	Record exact response and observable facts.
Recruitment and debt	Were they deceived, charged a fee, lent money, threatened over debt or recruited by an unknown intermediary?	Identify agent/fee/debt without detailed interrogation.
Pay and work	Do they receive and control pay? Are deductions clear? Are hours, rest, safety and duties as promised?	Preserve payslip/terms where voluntarily provided.
Documents/contact details	Who controls ID, bank card, phone, email, address or official documents? Are shared details voluntary?	Do not seize documents; note legitimate explanations.
Wishes and support	What help does the person want? Do they consent to contact with a First Responder or safeguarding service?	Record consent, capacity concerns and confidentiality explanation.
Wider risk	Could children, co-workers, household members, learners or other sites be affected?	Escalate potential wider population to DSL/case lead.

Appendix B: Immediate Response Checklist

Step	Required action	Complete / evidence
Recognise	Note indicators without deciding whether the legal offence is proved.	
Respond	Listen calmly; speak privately where safe; do not promise secrecy or confront anyone.	
Safety	Establish location, immediate danger, medical needs and whether controller can access the person.	
Record	Use exact words, facts, dates, names and observations; distinguish fact from assumption.	
Report	Submit Safeguarding Concern Form and contact DSL/DDSL same working day.	
Refer	DSL determines police, local authority, First Responder, FWA, funder/customer or specialist route.	
Preserve	Secure relevant records and avoid alerting suspected perpetrators or altering originals.	
Support	Agree safe contact method, follow-up, practical signposting and reasonable learner/worker adjustments.	
Review	Check wider risk, conflicts, notifications, remediation and case-action closure.	

Appendix C: Supplier and Employer Due-Diligence Checklist

Area	Minimum evidence / question
Organisation	Legal identity, ownership, addresses, service, locations and responsible senior contact.
Workforce	Direct/agency/subcontracted labour, worker types, recruitment countries/routes, pay model, accommodation/transport.
Recruitment fees	Confirmation that workers do not pay recruitment, placement or work-finding fees and that intermediaries are identified.
Documents and freedom	No retention of original ID; workers can leave; no threats, forced overtime or movement restrictions.
Pay and deductions	Pay complies with law; deductions transparent; wages controlled by worker; grievance and repayment routes.

Area	Minimum evidence / question
Policies and training	Relevant policy/statement, staff training, reporting route, worker communication and non-retaliation.
Supply chain	Material subcontractors and locations; flow-down requirements; ability to map higher-risk tiers.
Incidents	Convictions, investigations, concerns, remediation and lessons within a proportionate period.
Contract controls	Notification, audit/information access, remediation, suspension/termination and record-retention clauses.
Approval	Risk rating, approver, actions, due dates, monitoring frequency and re-assessment trigger.

Appendix D: Annual Modern Slavery Statement Checklist

Recommended heading	Minimum content
Organisation and supply chains	Current structure, trading entities, services, locations, workforce and direct/high-risk supply chains.
Policies	Relevant safeguarding, recruitment, whistleblowing, procurement, supplier, conduct and remediation requirements.
Risk assessment	When assessed, method, highest-priority risks to workers, governance and changes since prior year.
Due diligence and remediation	Supplier/worker engagement, checks, findings, actions, remedy and limitations.
Training	Audience, content, completion, role-specific learning and confidence/effectiveness checks.
Effectiveness	Meaningful measures, cases and outcomes where publication is safe, action completion and future targets.
Approval and publication	Correct financial year; board/equivalent approval; director signature/date; website/homepage link; publication within expected timeframe; registry decision.
Accuracy	Describe only steps actually taken. State gaps or no action honestly and set proportionate improvement commitments.

Appendix E: Version Control and Reference Framework

Version	Date	Owner / author	Summary of change	Next review
1.0	2021	Quack Group Ltd	Historic two-page statement for the calendar year ending December 2020; referred to former Group structure, locations, turnover/workforce information and prior-year activities.	Superseded
2.0	August 2026	Jessica Roughton / Dion Bishop	Complete replacement for current adult skills, recruitment and supply-chain operations. Added legal-status clarification, risk assessment, ethical recruitment, learner and employer controls, due diligence, indicators, safeguarding/NRM routes, remediation, monitoring and practical checklists.	August 2027

Reference framework

Modern Slavery Act 2015 and section 54 regulations; Home Office Transparency in Supply Chains: a Practical Guide (December 2025); Home Office National Referral Mechanism Guidance for Adult Cases in England and Wales (April 2026); PPN 009 Tackling Modern Slavery in Government Supply Chains (October 2025); Procurement Act 2023; Care Act 2014 and safeguarding guidance; employment, agency, wage, data-protection and health-and-safety requirements; Quack Safeguarding, Whistleblowing, Safer Recruitment, Counter Fraud, Conflict of Interest, Learner Support and Information Security policies; applicable commissioner and awarding-organisation contracts.