



**XYZ Music Academy Ltd**

# **Modern Slavery and Exploitation Policy**

**Policy Version:** 1.0

**Approved By:** Managing Director

**Policy Owner:** Duncan Lee, Managing Director

**Review Date:** Annually

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## **1. Policy Statement**

XYZ Music Academy Ltd is committed to preventing modern slavery, human trafficking, forced labour, child labour, servitude, and all forms of exploitation within its organisation and supply chains.

We recognise our responsibility to uphold human rights and to ensure that all individuals connected with the Academy are treated with dignity, respect, and fairness.

XYZ Music Academy operates a zero-tolerance approach towards modern slavery and exploitation and is committed to acting ethically, transparently, and with integrity in all business activities.

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## 2. Purpose

The purpose of this policy is to:

- Prevent modern slavery and exploitation within the Academy.
  - Protect employees, tutors, volunteers, students, and vulnerable individuals.
  - Promote awareness of exploitation risks.
  - Establish clear reporting procedures.
  - Ensure compliance with the:
    - Modern Slavery Act 2015
    - Children Act 1989 and 2004
    - Care Act 2014
    - Human Rights Act 1998
    - Working Together to Safeguard Children
    - Keeping Children Safe in Education (KCSIE)
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## 3. Scope

This policy applies to:

- Employees
- Tutors
- Volunteers
- Directors
- Contractors
- Consultants
- Agency Workers
- Apprentices
- Students on work placements
- Suppliers and service providers

The policy applies across all activities undertaken by XYZ Music Academy including:

- Peripatetic music lessons

- School-based provision
  - Alternative Provision settings
  - Holiday workshops
  - Community programmes
  - Events and performances
  - Online learning environments
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## 4. Definition of Modern Slavery

Modern slavery is a serious crime and a violation of fundamental human rights.

It can take many forms including:

### **Human Trafficking**

The recruitment, transportation, transfer, harbouring, or receipt of people through force, coercion, deception, or abuse for the purpose of exploitation.

### **Forced Labour**

Work or services extracted from a person under threat, coercion, intimidation, or abuse.

### **Debt Bondage**

A person being forced to work to repay debts that they cannot realistically clear.

### **Servitude**

Where an individual is forced to live and work under the control of another person.

### **Child Labour**

The exploitation of children through work that is harmful, unsafe, or interferes with their education and wellbeing.

### **Criminal Exploitation**

The manipulation of children or vulnerable adults into criminal activity for another person's gain.

Examples include:

- County Lines activity
- Forced theft
- Drug trafficking
- Fraud
- Financial exploitation

## **Sexual Exploitation**

The coercion, manipulation, or abuse of an individual into sexual activity for another person's benefit.

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# **5. Recognising Signs of Exploitation**

Staff should remain alert to indicators that may suggest exploitation.

Possible signs include:

## **General Indicators**

- Fearful, withdrawn, or anxious behaviour
- Signs of physical abuse or neglect
- Limited freedom of movement
- Appearing controlled by another individual
- Inconsistent explanations about living arrangements
- Lack of personal possessions
- Poor attendance patterns
- Sudden behavioural changes

## **Child Exploitation Indicators**

- Unexplained gifts, money, phones, or expensive items
- Missing education regularly
- Association with older individuals
- Frequent unexplained absences
- Use of multiple mobile phones
- Secretive behaviour
- Increased risk-taking

## **Vulnerable Adult Indicators**

- Financial exploitation

- Isolation from support networks
- Dependence on controlling individuals
- Fear of speaking openly

No single indicator confirms exploitation, but concerns should always be reported and assessed.

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## **6. Responsibilities**

### **Managing Director**

The Managing Director will:

- Promote a culture of vigilance and safeguarding.
- Ensure policies are implemented effectively.
- Support investigations where concerns arise.
- Ensure appropriate staff training is available.

### **Designated Safeguarding Lead (DSL)**

The DSL will:

- Manage concerns relating to exploitation.
- Liaise with safeguarding partners.
- Make referrals where appropriate.
- Maintain records of concerns and actions taken.

### **Employees, Tutors and Volunteers**

All staff must:

- Remain alert to signs of exploitation.
  - Report concerns immediately.
  - Complete safeguarding training.
  - Follow Academy safeguarding procedures.
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## 7. Recruitment and Employment Practices

XYZ Music Academy seeks to prevent exploitation through fair recruitment processes.

The Academy will:

- Verify the identity of all employees.
- Conduct right-to-work checks.
- Follow safer recruitment procedures.
- Ensure all employment is voluntary.
- Pay employees fairly and lawfully.
- Ensure employment contracts are clear and transparent.
- Prohibit the use of forced, bonded, or involuntary labour.

The Academy will never knowingly engage individuals who are victims of labour exploitation without taking appropriate safeguarding action.

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## 8. Supply Chain Responsibility

XYZ Music Academy expects suppliers and contractors to uphold ethical working practices.

Where appropriate, the Academy will:

- Work with reputable suppliers.
- Raise concerns where exploitation risks are identified.
- Cease relationships with suppliers involved in unlawful or unethical practices.
- Encourage transparency throughout procurement processes.

Suppliers are expected to comply with relevant employment, safeguarding, and human rights legislation.

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## 9. Reporting Concerns

Any concerns regarding modern slavery or exploitation must be reported immediately.

### Internal Reporting

Concerns should be reported to:

- Designated Safeguarding Lead (DSL)
- Deputy DSL
- Managing Director

## **Emergency Situations**

If an individual is believed to be at immediate risk of harm:

- Contact emergency services (999)
  - Inform the DSL as soon as possible
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# **10. Responding to Concerns**

Upon receiving a concern, the Academy will:

1. Take the concern seriously.
2. Record information accurately.
3. Assess immediate risk.
4. Consult safeguarding procedures.
5. Refer concerns to appropriate agencies where necessary.
6. Maintain confidentiality.
7. Support affected individuals.

Staff must not investigate concerns independently.

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# **11. Confidentiality and Information Sharing**

Information will be shared only where necessary:

- To safeguard children or vulnerable adults.
- To comply with legal obligations.
- To support investigations.

The welfare of the child or vulnerable person will always take priority.

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## 12. Training and Awareness

XYZ Music Academy will ensure staff receive:

- Safeguarding training.
- Awareness of exploitation risks.
- Guidance on recognising indicators.
- Information on reporting procedures.

Training may form part of induction and ongoing professional development.

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## 13. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy
  - Child Sexual Exploitation Policy
  - Staff Code of Conduct
  - Safer Recruitment Policy
  - Whistleblowing Policy
  - Equality and Diversity Policy
  - Health and Safety Policy
  - Online Safety Policy
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## 14. Monitoring and Review

The Academy will review this policy annually or sooner where:

- Legislation changes.
- Safeguarding guidance changes.
- Serious incidents identify a need for revision.

Monitoring may include:

- Safeguarding audits.
- Staff training records.
- Recruitment compliance checks.
- Review of safeguarding concerns.

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## 15. Commitment

XYZ Music Academy is committed to creating a safe, ethical, and inclusive environment where all individuals are protected from exploitation, abuse, and modern slavery.

We will work proactively with staff, schools, families, local authorities, and safeguarding partners to promote the welfare, safety, and rights of every child, young person, and adult involved in our provision.

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### Approval

**Approved by:** Duncan Lee

**Position:** Managing Director

**Organisation:** XYZ Music Academy Ltd

**Date Approved:** June 2026

**Next Review Date:** June 2027