

# Modern Slavery Policy

Most recent update: 02 April 2025

## Scope

This approach covers all provision, delivered internally by Cheshire West & Chester Council's (CW&C) Skills and Employment team - including our Employment Support delivery teams - and externally by our contracted partner providers. It covers all service participants and provides information on our overarching approach to raising awareness and tackling Modern Slavery in Cheshire and forms part of our overall approach to safeguarding our learners/customers. Through awareness raising and clear communication, we can ensure our learners/customers get access to the right support and we can play our part in tackling modern slavery as the reality of trafficking, slavery and exploitation is happening across the UK including Cheshire.

All staff, in whatever setting and role, are in the front line in preventing harm, abuse or exploitation occurring including alleviating distress and in taking action. We include tackling modern slavery within this remit and this approach covers both adults and children.

This policy is underpinned by the Modern Slavery Act 2015 and aligns with information on Cheshire West and Chester's Local Adult Safeguarding Board website

[www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/Isab](http://www.cheshirewestandchester.gov.uk/residents/health-and-social-care/adult-social-care/Isab)

## Purpose

The purpose of detailing our approach to Modern Slavery is to ensure our learners, service users and staff, including volunteers, are safe both when they are with us and as they transition into work. We will ensure that they have clear reporting mechanisms to alert us to actual and/or potential harm/distress going on in their lives with the knowledge that we will take appropriate and timely action to help them.

We will achieve this by:

- Having separate but linked policies covering each sub-aspect of our overall approach to safeguarding including Modern Slavery,
- Posters in every learning environment,
- Having a Designated Lead Safeguarding Officer and a Deputy Designated Deputy Safeguarding Officer within the Skills & Employment team for staff to report learner disclosures or staff concerns relating to Modern Slavery,
- Clear and publicised methods of reporting concerns and a 'just report' ethos for staff and partners,
- Regular staff training and awareness-raising including Modern Slavery awareness training,
- Maintaining and managing a central log of disclosures.

## What is Modern Slavery?

Modern Slavery, by its nature, is a largely hidden crime, but the Government recently estimated that between 10,000 and 13,000 people are currently being subjected to some form of modern slavery in the UK – and although some may be more vulnerable to exploitation than others, it is an issue unrestricted by age, gender or background.

The term 'Modern Slavery' captures a whole range of exploitation, many of which can occur together.

These include, but are not limited to:

- Trafficking - involving the transportation, recruitment or harbouring of people for purposes of exploitation using immoral means, including violence, threats, deception, coercion, abduction or bribery,
- Sexual exploitation - including sexual abuse, forced prostitution and the production of child pornography,
- Forced labour - with victims being forced to work long hours for little or no pay, in poor conditions and under threat of violence to them and/or their families,
- Domestic servitude - where a victim is forced to work in a private household usually performing domestic chores and childcare duties,
- Child slavery - in addition to forced child labour, this can involve child trafficking, forced marriage and child domestic servitude,
- Criminal exploitation – the exploitation of a person to commit a crime or combination of crimes, such as shoplifting, cannabis cultivation, drug trafficking and other similar activities,
- County lines - is the organised criminal distribution of drugs from the big cities into smaller towns and rural areas using children and vulnerable people. Although cannabis is occasionally linked to the county lines organisations, it is harder drugs that provide the focus: heroin, cocaine, and amphetamines.
  - The influence of county lines is nationwide. Young people, typically 15 and 16, but sometimes younger, travel by coach, train, and taxi into rural or coastal areas, with only a 'burner', or disposable phone, often stolen, and a stash of drugs. For the gang's security each runner only knows one other phone number along the delivery chain.
  - The drug runner needs a place to stay and to do this the gang will take over the home of a vulnerable person, often after following them home. This is known as "cuckooing". Once in the property, drugs and weapons can be stored there along with a possible venue for dealing drugs and the sexual exploitation of girls and young women. The victim may have been criminally exploited even if the activity appears consensual.

Common to all the above is abuse of power or vulnerability to coerce people into a life of exploitation, servitude and inhumane treatment or the personal or financial gain of others. Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive.

### Consent

In the case of children, the consideration of consent is irrelevant but it can be a consideration in identifying adult exploitation but it is also irrelevant if the adult has been deceived or coerced. Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

## Signs Of Exploitation/Coercion

There is no definitive list of signs or factors but some general indicators that could be present.

A person or people may:

- Exhibit withdrawn behaviour, appear scared and not willing to talk.
- Not have the appropriate clothing for the work they are being expected to do.
- Have injuries consistent with abuse or other controlling measures.
- Appear under-nourished or particularly unkempt.
- Have limited or no contact with friends and family.
- Appear in fear of their employers or of authority or display signs of psychological trauma.
- Be in debt bondage – in debt to, or dependent on someone else.
- Live in accommodation which is poorly maintained, overcrowded, has blacked out windows.
- Have a lack of control – no ID, no access to bank account, work transport provided.
- Have a lack of freedom – unable to move freely, unwilling or scared to leave.
- Be children who are alone, not related to adult carer, with inappropriate behaviour/clothing.

Signs of involvement in County Lines activity:

- Persistently going missing from school or home and/or being found out-of-area.
- Unexplained acquisition of money, clothes, or mobile phones.
- Excessive receipt of texts/phone calls and/or having multiple handsets.
- Relationships with controlling/older individuals or groups.
- Leaving home/care without explanation.
- Unwillingness to go home; conversations about issues with people 'staying' within the homel.
- Suspicion of physical assault/unexplained injuries.
- Parental concerns.
- Carrying weapons.
- Significant decline in school results/performance.
- Gang association or isolation from peers or social networks.
- Self-harm or significant changes in emotional well-being.

## What Do We Need To Do?

We work on a daily basis with adults who could be vulnerable to abuse and our Family Learning team work with parents and children. Our customers may have children that are not in contact with our services due to their age but they report concerns to us. It is vital that we are aware of the potential for criminal exploitation and abuse of the customers we work with and their families. We must:

- Remain vigilant and aware of any signs of distress/exploitation when working with our learners/customers whatever the cause, we can and will support them.
- Create safe environments in which they will trust us to help them.

- Raise awareness within our centres and within our learning provision through our tutors.
- Create the opportunities for people to talk to us in confidential environments, though stress that that Modern Slavery/exploitation, even when it appears consensual, is a safeguarding issue and we have a duty to report.
- Be aware of signs of Modern Slavery in the workplace when placing customers in work experience/work trial situations ensuring appropriate health and safety checks are made.
- Be vigilant regarding the employment opportunities our customers take up and keep in touch with them to ensure they have settled in well and their contracts, pay and conditions are in line with UK employment law. All customers placed in employment under our funded projects will have an employer health and safety check conducted.
- Within our general employer engagement work, be aware of any signs that may indicate that employment practice is not in accordance with UK employment law.

### Reporting Suspicions of Modern Slavery/Exploitation

Suspicion about Modern Slavery including exploitation e.g. County lines activity is a Safeguarding issue and should be reported under our standard Safeguarding/Disclosure reporting mechanism.

In summary:

1. Report immediately to your organisation's Safeguarding Lead for a first line response which may include telephoning the police on 999/101 if someone is in imminent danger.
2. Complete a Disclosure report within 48 hours and submit to our Designated Safeguarding Lead. (Safeguarding reports available on the [Skills and Employment pages](#) of the Cheshire West and Chester website).
3. CW&C Safeguarding lead to agree actions and response.
4. All reports of Modern Slavery will be reported to the Local Authority Safeguarding teams and Local Authorities have a duty to report all instances of Modern Slavery to the Secretary of State under separate procedures.

Referral routes for initial support are:

- 999 in case of an emergency
- 101 about a general situation
- 0800 0121 700 for the Modern Slavery helpline
- 0800 555111 for Crimestoppers (anonymously)

[Cheshire West and Chester Safeguarding Children Partnership](#) provides information and outlines the action that professionals should take if they are concerned that a child has been – or is at risk of being – trafficked. Consideration can also be given to the completion of a Child Exploitation Tool to explore the impact upon the child.

Further information can also be found in the Skills and Employment Overarching Approach to Safeguarding Policy.