Bourne Alliance
Multi Academy Trust

Policy document for: **Modern Slavery**

Updated: Autumn 2026

This policy forms part of the Trust Safeguarding and Child Protection policy and reflects the latest KCSIE guidance. Keeping children safe in education 2026 (comes into force from 1 September 2026) See page 19 & page 169-for full details. **All staff must read KCSIE Part 1 as a minimum. DSLs and senior leaders must be familiar with Parts 2, 5 and Annex B.**

Modern slavery is a serious safeguarding concern and a criminal offence. Children can be exploited through forced labour, criminal activity, sexual exploitation, trafficking, debt bondage or coercion, including when they appear to be willing participants. In line with Keeping Children Safe in Education (KCSIE) 2026, our Trust recognises modern slavery as a distinct safeguarding category and ensures that all staff understand the indicators, respond immediately, and treat every exploited child as a victim who requires protection and support.

Modern slavery is closely linked to child criminal exploitation (CCE), child sexual exploitation (CSE), county lines, serious violence, online harm, gender-based violence, and child-on-child abuse. Children may not recognise they are being harmed and may be controlled through fear, threats, manipulation or debt.

Definitions

Modern slavery includes, but is not limited to:

- Trafficking (within the UK or across borders)
- Forced labour
- Domestic servitude
- Debt bondage
- Criminal exploitation (including drug running, weapon carrying, theft, violence)
- Sexual exploitation
- Online exploitation, including coercion into creating sexual imagery
- Coercion, control, threats or deception for the purpose of exploitation

Children exploited through modern slavery—including CCE—must be treated as victims of trafficking, even if they have committed offences

Indicators of Modern Slavery

Staff must be alert to indicators that a child may be a victim of modern slavery, including:

Financial exploitation

- Debt bondage (child feels they owe money to an older peer/adult)
- Sextortion linked to financial control
- Being forced to create “self-generated intimate imagery” to settle debts

Behavioural and physical indicators

- Fearful, withdrawn, anxious or aggressive behaviour
- Signs of assault, unexplained injuries or sexualised behaviour
- Sudden possession of money, gifts or new items
- Being controlled by an older individual or group
- Missing episodes or unexplained absences

- Being transported to unknown locations
- Working long hours or performing tasks for adults

Online indicators

- Online recruitment or grooming
- Coercion via social media
- Deepfakes or AI-generated coercive content
- Online sexual exploitation
- Online trafficking networks

Contextual indicators

- Association with known risky individuals
- Involvement in county lines activity
- Carrying drugs or weapons
- Group-based harm or peer exploitation

Staff must not allow a child's **challenging behaviour or criminality** to mask the underlying reality that they are being exploited

Immediate Reporting Duty (All Staff)

All staff must:

- Report concerns immediately to a DSL
- Do not investigate
- Do not speak to families
- Record verbatim disclosures
- Log concerns on CPOMS only after DSL instruction

Children may disclose partially or indirectly; any indicator must be treated as a safeguarding concern.

DSL Responsibilities (Annex B)

DSLs must:

- Immediately assess risk to the child and others
- Consider contextual safeguarding (school, home, community, online)
- Determine whether immediate protective action is required
- Initiate a Safety and Support Plan
- Consider referral to:
    - Police (999 if immediate danger)
    - Front Door / Family Help
    - MACPT
    - Youth justice or VRU partners
    - National Referral Mechanism (NRM)
- Record the incident on CPOMS once safe to do so
- Maintain accurate chronologies
- Consider whether the child is a victim, perpetrator, or both
- Consider online safety measures
- Share information lawfully, including without consent if a child is at risk
- Liaise with an Independent Child Trafficking Guardian (ICTG) where appropriate

National Referral Mechanism (NRM)

KCSIE 2026 emphasises a strong expectation that an NRM referral is made as soon as modern slavery is suspected, regardless of whether the child is cooperating.

DSLs must:

- Understand when an NRM referral is required
- Complete the referral promptly
- Work with police, social care and ICTGs
- Support the child throughout the process
- Ensure multi-agency partners are engaged

Online Exploitation

Modern slavery increasingly occurs online. Staff must recognise:

- Online grooming and recruitment
- Coercion into sexual imagery
- Deepfake or AI-generated sexual content
- Online trafficking networks
- Social media used to control, threaten or manipulate

Online concerns must be reported **in the same way as physical concerns**.

County Lines and Serious Violence

Modern slavery is closely linked to:

- County lines drug running
- Debt bondage
- Coercion
- Serious violence
- Weapon carrying
- Grooming by older peers or adults

Children involved in county lines must be treated as **victims of exploitation**, not offenders.

Gender-Based Violence and Misogyny

Girls and gender-diverse pupils are disproportionately targeted for:

- Sexual exploitation
- Online sexual coercion
- Trafficking
- Group-based harm

Staff must respond robustly to misogyny and gender-based threats and ensure targeted support.

Early Help and Multi-Agency Working

In line with KCSIE 2026 and Working Together 2023, DSLs must:

- Consider Early Help pathways
- Work with MACPT, VRU, police, Family Help and youth justice
- Engage in multi-agency planning
- Share information confidently and lawfully

Information Sharing

KCSIE requires:

- GDPR is **not** a barrier to safeguarding
- Information can be shared **without consent** if a child is at risk
- DSLs must maintain secure, accurate records
- Staff must understand the lawful basis for sharing information

Record Keeping and Transfer of Files

All BA MAT schools must:

- Keep accurate, factual, timely records securely on CPOMS

- Record verbatim disclosures
- Maintain chronologies
- Transfer safeguarding files to new schools **within five days**

Child-on-Child Abuse (Part Five)

Modern slavery can involve:

- Peer exploitation
- Group-based harm
- Online peer exploitation
- Sexual exploitation
- Power imbalance and coercion

DSLs must follow **KCSIE Part 5** procedures for sexual violence and harmful sexual behaviour.

Allegations Against Staff and Low-Level Concerns

Staff must follow Trust policies and KCSIE Part 2. Staff must report:

- Concerns about staff behaviour
- Low-level concerns
- Allegations
- Whistleblowing concerns

DSLs must follow the Allegations Against Staff policy.

Curriculum Responsibilities

In line with KCSIE Part 2, schools must teach pupils:

- Coercion and exploitation
- Healthy relationships
- Online safety
- Gender equality and anti-misogyny
- Help-seeking and trusted adults

Content is delivered through Kapow, No Outsiders, and adapted appropriately at Aspire School.

Additional Guidance

- Modern Slavery Act 2015
- Home Office Modern Slavery Strategy
- County Lines Guidance
- Youth Endowment Fund Toolkit
- ICTG guidance

DSL Flowchart

