Riverston School

Modern Slavery and Human Trafficking Policy:

Our Approach

Cavendish Education Group

Modern Slavery and Human Trafficking Group Policy

1. Policy statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking and may involve adults or children. Exploitation can be hidden and may include coercion, debt bondage, threats, withheld wages or identity documents, recruitment fees, restriction of movement or abuse of vulnerability. We do not tolerate modern slavery and are committed to acting ethically, safeguarding potential victims and implementing proportionate, risk-based systems and controls in our operations and supply chains.

1.2 We are committed to transparency and continuous improvement in tackling modern slavery. The Group will assess annually whether any entity, or the Group when the statutory turnover rules are applied, is required to publish a slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015. Where required, the statement will cover each relevant financial year, be approved by the appropriate board, and published prominently on the relevant website in accordance with the Act.

1.3 This policy applies to all persons working for or on behalf of the Group in any capacity, including employees at all levels, directors, governors or trustees, officers, agency and seconded workers, volunteers, interns, agents, contractors, consultants, third-party representatives and business partners. Risk-based contractual and due-diligence requirements apply to suppliers and, where appropriate, their supply chains. This policy should be read with the Safeguarding and Child Protection, Whistleblowing, Recruitment, Procurement, Supplier Due Diligence and Data Protection policies.

1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. Responsibility for the policy

2.1 The proprietary body has overall responsibility for this policy, oversight of material modern-slavery risks and approval of any statement required under section 54. It will receive proportionate assurance on risk assessment, due diligence, training, concerns, remediation and the effectiveness of controls. Each school governing body and headteacher remains responsible for its safeguarding duties and local implementation.

2.2 The Director of Risk has primary day-to-day responsibility for coordinating implementation, maintaining the Group risk assessment and action plan, monitoring effectiveness, supporting procurement and human-resources due diligence, keeping appropriate records, coordinating disclosures and reporting material issues to the board. The Director of Risk will work with the Designated Safeguarding Lead where a child or adult at risk may be affected and will ensure conflicts of interest do not compromise decisions.

2.3 Managers are responsible for ensuring those reporting to them understand and comply with this policy, receive role-appropriate training and escalate warning signs. Procurement, HR and contract managers must apply proportionate risk assessment and due diligence before appointment and throughout higher-risk relationships, including scrutiny of recruitment practices, labour providers, subcontracting, worker-paid recruitment fees, wage and working-condition risks, and credible corrective action.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Director.

3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 Everyone working for us or under our control is responsible for helping to prevent, identify and report modern-slavery risks. You must not engage in, facilitate, conceal or ignore conduct that may breach this policy. You must not confiscate identity documents, charge workers recruitment fees, use unauthorised labour providers, make misleading records or take action that could place a potential victim at greater risk.

3.3 You must report promptly if you believe or suspect that modern slavery, exploitation or a breach of this policy has occurred or may occur. Report to your line manager, the Compliance Director or, where a child or adult at risk may be involved, the Designated Safeguarding Lead. If any of those persons may be implicated or conflicted, use the alternative route in the Whistleblowing Policy.

3.4 Concerns about our operations or any tier of a supply chain must be raised at the earliest safe opportunity. Do not confront a suspected exploiter, alert them to a report, conduct an unauthorised investigation or take action that could endanger a potential victim. Preserve relevant information and follow safeguarding and incident-response instructions.

3.5 If there is an immediate danger or a crime in progress, call 999. Other concerns must be assessed promptly and referred through the appropriate safeguarding, law-enforcement or modern-slavery route. Referrals concerning children must follow the school's Safeguarding and Child Protection Policy and current Keeping Children Safe in Education and local safeguarding-partnership procedures. A referral into the National Referral Mechanism must be made by an authorised first responder and informed consent requirements differ for adults and children.

3.6 You do not need proof before raising a concern. If you are unsure whether conduct, recruitment practices, accommodation, pay, debt, freedom of movement or working conditions may indicate exploitation, raise it with your manager, the Director of Risk or Designated Safeguarding Lead. The response must be victim-centred, trauma-informed and sensitive to confidentiality, immigration concerns and the risk of retaliation.

3.7 We will support anyone who raises a genuine concern and will not tolerate retaliation. The Public Interest Disclosure Act 1998, through the Employment Rights Act 1996, protects eligible workers in specified circumstances where they make a qualifying protected disclosure; among other requirements, the worker must reasonably believe the disclosure is in the public interest. Legal protection is not accurately described as a general 'good faith' test. Knowingly false or malicious allegations may be addressed under the relevant procedure, but an unsubstantiated concern raised with a reasonable belief must not itself result in adverse treatment. Concerns about retaliation should be reported to the Compliance Director or through the Whistleblowing or Grievance Policy.

4. Communication and awareness of this policy

4.1 Awareness of this policy forms part of induction. Refresher and enhanced role-based training will be provided according to risk, particularly for the board, senior leaders, Designated Safeguarding Leads, HR, recruitment, procurement, finance, estates and contract-management staff. Training will cover indicators, safe reporting, victim protection, due diligence, record keeping and lessons learned.

4.2 Our requirements will be communicated to suppliers, contractors and business partners at the outset and reinforced according to risk. Contracts should include proportionate obligations concerning modern slavery, lawful recruitment, access to information, notification of concerns, cooperation with audits and investigations, flow-down to relevant subcontractors and corrective action. Higher-risk contracts will be monitored during performance, not only at onboarding.

5. Breaches of this policy

5.1 An employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct, subject to a fair process. No disciplinary outcome is predetermined by this policy, and a potential victim must not be penalised for conduct arising directly from their exploitation without appropriate assessment and advice.

5.2 We may suspend, remediate or terminate a relationship with an individual or organisation that breaches this policy. Decisions must prioritise the safety and interests of potential victims and consider whether abrupt termination could worsen harm. Where safe and appropriate, we will require time-bound corrective action, worker remedy, repayment of recruitment fees or withheld wages, strengthened controls and verification; serious,

continuing or unremedied concerns will be escalated and may result in termination and external reporting.