Modern Slavery Policy

Effective Date: September 2026

Review Date: April 2027

Purpose

This Modern Slavery Policy sets out Life Journey Academy's commitment to preventing modern slavery and human trafficking within its operations and supply chains, and to recognising and responding appropriately where children, young people or adults receiving support may be experiencing exploitation or modern slavery.

It supports LJA's safeguarding responsibilities and ethical practices and should be read alongside LJA's Safeguarding Policy.

Scope

This policy applies to:

- All staff, volunteers, and contractors working for or on behalf of Life Journey Academy.
- Suppliers and third-party partners providing goods or services to the academy (e.g., suppliers of digital tools, educational materials, or workspace facilities).
- Children, young people and parents/guardians, who are encouraged to report concerns related to modern slavery. It covers all office-based, outreach, community, and partnership activities undertaken by Life Journey Academy.
- Adults receiving mentoring support, who may themselves be vulnerable to modern slavery or exploitation.

Objectives

- Prevent modern slavery and human trafficking within the academy's operations and supply chains.
- Raise awareness among staff, volunteers, and stakeholders about modern slavery risks.
- Implement procedures to identify, assess, and address potential modern slavery concerns.
- Promote ethical practices in line with the academy's values as a mentoring and education provider.

Policy Statement

- Life Journey Academy is committed to:
- Acting ethically and with integrity to ensure no form of modern slavery or human trafficking occurs in its operations or supply chains.
- Complying with the UK Modern Slavery Act 2015 and related legislation.
- Training staff and volunteers to recognise and report signs of modern slavery.
- Collaborating with suppliers and partners to uphold anti-slavery standards.

Definitions

- **Modern Slavery**: Includes slavery, servitude, forced or compulsory labour, and human trafficking, as defined by the Modern Slavery Act 2015.
- **Human Trafficking**: Recruiting, transporting, or harbouring individuals through force, coercion, or deception for exploitation.
- **Supply Chain**: Any third-party providers of goods or services to the Life Journey Academy, such as suppliers of educational resources, cleaning services, or IT support.
- **Exploitation:** The abuse of an individual for another person's benefit or advantage. Exploitation may include sexual exploitation, criminal exploitation, forced labour, domestic servitude or other forms of abuse connected with modern slavery.
- **National Referral Mechanism (NRM):** The UK's framework for identifying and referring potential victims of modern slavery and ensuring they can access appropriate support.

- **First Responder Organisation:** An organisation authorised to refer potential victims of modern slavery into the National Referral Mechanism. LJA is not currently a designated First Responder Organisation.

Commitment to Preventing Modern Slavery

Life Journey Academy will:

- **Prohibit Modern Slavery**: Ensure no forced labour, exploitation, or trafficking occurs in its operations, including among staff, volunteers, or children, young people, and adults.
- **Safeguarding**: Integrate modern slavery awareness into safeguarding procedures, recognising that children, young people, adults or families may be vulnerable to exploitation.
- **Ethical Recruitment**: Ensure all staff and volunteers are recruited fairly, with contracts and pay compliant with UK employment laws, and verify right-to-work documentation to prevent forced labour.
- **Supply Chain Due Diligence**: Assess suppliers for modern slavery risks and require adherence to anti-slavery principles.

Risk Assessment

Operational Risks: The academy will assess risks of modern slavery in its activities, such as:

- Recruitment of staff or volunteers (e.g., ensuring no exploitation in hiring processes).
- Delivery of mentoring or educational programmes, including identifying vulnerabilities among children, young people, and adults. Adults receiving LJA's mentoring support, particularly those with neurodivergent profiles, SEMH needs, or trauma histories, may be vulnerable to exploitation. Staff remain alert to indicators of modern slavery in adult contexts as well as with children and young people.

Supply Chain Risks:

Life Journey Academy operates with a minimal supply chain. Third-party providers used by LJA may include workspace facilities, digital tools, and educational materials. Where suppliers are engaged, LJA selects providers who operate ethically and in compliance with the Modern Slavery Act 2015. As LJA grows and its supply chain expands, formal supplier due diligence processes including questionnaires and contract clauses will be introduced. At present, any concerns about supplier practices are raised directly with the relevant provider and escalated to the DSL where they involve exploitation risk.

Procedures for Preventing Modern Slavery

Supplier Engagement:

- LJA operates with a limited supply chain and takes a proportionate, risk-based approach to supplier due diligence. Where appropriate, LJA considers the nature of the supplier, the services provided and any identifiable modern slavery or labour exploitation risks when selecting or reviewing suppliers.
- Where higher-risk suppliers or contractual arrangements are identified, LJA may seek additional assurances regarding ethical employment and modern slavery practices. As LJA's operations and supply chain grow, more formal supplier due diligence arrangements may be introduced.

Recruitment and Employment:

- All staff and volunteers will undergo fair recruitment processes, with checks for right-to-work documentation to prevent exploitation.
- The academy will ensure compliance with the National Minimum Wage and provide clear contracts.

Safeguarding Integration:

- Modern slavery, trafficking and exploitation involving a child are safeguarding concerns and forms of child abuse. Any concern that a child or young person may be experiencing modern slavery, trafficking or exploitation must be reported to the DSL without delay and managed in accordance with LJA's Safeguarding Policy.

- Concerns involving adults at risk are managed in accordance with LJA's adult safeguarding procedures.
- Where appropriate, LJA will make or support referrals to children's social care, adult safeguarding services, the police or another relevant safeguarding agency. Where sexual or criminal exploitation is suspected, relevant exploitation procedures will also be followed.

National Referral Mechanism (NRM)

- The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting potential victims of modern slavery and human trafficking.
- LJA is not currently a designated First Responder Organisation and therefore does not make NRM referrals directly. Where LJA identifies or suspects that a child, young person or adult may be a potential victim of modern slavery, the DSL will take appropriate safeguarding action and liaise with an authorised First Responder Organisation, such as the relevant local authority or police, where an NRM referral should be considered.
- Where the potential victim is a child, safeguarding the child is the immediate priority. Children do not need to consent to an NRM referral.
- Where the potential victim is an adult, their consent is normally required for referral into the NRM. LJA will follow applicable safeguarding procedures and work with an authorised First Responder Organisation where appropriate.

Reporting Concerns:

- Staff and volunteers must report any concern or suspicion of modern slavery, trafficking or exploitation involving a child, young person or adult receiving support to the DSL without delay.
- Children, young people, adults, parents/carers and other stakeholders may also raise concerns directly with LJA.
- Where there is an immediate risk of harm or a crime is in progress, the police should be contacted on 999. Other concerns will be assessed by the DSL and referred or escalated to the appropriate safeguarding or statutory agency where required.

Training and Awareness

Staff and Volunteers:

- Staff and volunteers receive information and training appropriate to their roles on recognising and responding to exploitation and modern slavery. This is incorporated into safeguarding induction and refresher training and includes relevant indicators, reporting procedures and the relationship between modern slavery, trafficking, criminal exploitation and sexual exploitation.

Children, young people, adults and Parents/Guardians:

Where relevant to an individual's age, needs, circumstances or identified risks, mentoring may include age-appropriate work on personal safety, healthy relationships, exploitation, coercion, online risks and how to seek help.

Monitoring and Reporting

Internal Monitoring: The Designated Modern Slavery Coordinator will:

- Periodically review supplier arrangements where appropriate.
- Monitor safeguarding reports for modern slavery indicators.
- Maintain records of training and reported concerns.

Transparency: LJA is not currently required to publish an annual Modern Slavery Transparency Statement under Section 54 of the Modern Slavery Act 2015, as its annual turnover is below the £36 million threshold. LJA voluntarily commits to transparent practice and will publish a statement if it reaches the statutory threshold or chooses to do so voluntarily.

Incident Reporting: Any suspected modern slavery, trafficking or exploitation concern will be recorded and managed in accordance with LJA's safeguarding procedures. LJA will make or support referrals to relevant safeguarding or statutory authorities where

required and will cooperate with any subsequent assessment or investigation undertaken by the appropriate authority.

Key Responsibilities

Directors: Oversee implementation of this policy, organisational risk management, ethical recruitment and proportionate supplier due diligence.

Designated Safeguarding Lead (DSL): Leads LJA's safeguarding response where modern slavery, trafficking or exploitation is suspected and liaises with relevant safeguarding agencies and authorised First Responder Organisations where appropriate.

Staff and Volunteers: Complete relevant safeguarding training, remain alert to indicators of exploitation or modern slavery, report concerns without delay and follow LJA's safeguarding procedures.

Suppliers and Contractors: Are expected to operate lawfully and ethically and to cooperate with proportionate due diligence undertaken by LJA.

Review and Updates

This policy will be reviewed annually or following significant changes (e.g., new legislation, incidents). Updates will be approved by the directors and communicated to staff, volunteers, suppliers, and parents/guardians. Feedback can be submitted to Natalia Krasnianska, Operations Director**.**

Compliance

This policy is informed by:

- Modern Slavery Act 2015.
- Children Act 1989 and Children Act 2004.
- Modern Slavery: Statutory Guidance for England and Wales.
- Keeping Children Safe in Education (KCSIE) 2026, where relevant to LJA's work with children, schools and commissioners.
- Working Together to Safeguard Children 2026.

- Relevant local safeguarding and exploitation procedures.

Contact Information

For questions or to report concerns: Natalia Krasnianska, Operations Director.

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