



Modern Slavery Policy

Introduction

DRL Services Ltd (“DRL”) is committed to meeting the aims of the Modern Slavery Act 2015 and to the prevention and abolition of modern slavery, servitude, forced and compulsory labour and human trafficking. DRL has a zero-tolerance approach to all forms of modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships.

Modern slavery is a criminal offence and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Victims are often hidden in plain sight and can be found in every sector of the economy.

DRL recognises that its staff, apprentices and supply chain partners all have a role to play in identifying and reporting concerns.

Scope

This policy applies to all persons working for or on behalf of DRL in any capacity, including directors, staff, associates, contractors, subcontractors, suppliers and apprentices. It extends to all business dealings and supply chain relationships.

Related Policies and Documents

This policy should be read alongside the following DRL documents and external guidance; duplication is avoided and cross-references are used throughout:

- Safeguarding Policy – reporting concerns, referral pathways, and the role of the Designated Safeguarding Lead
- Prevent Policy – identification and referral of individuals vulnerable to exploitation and radicalisation
- Equality, Diversity & Inclusion Policy – legal framework, non-discrimination and dignity at work
- Health & Safety Policy – risk assessment, working conditions and welfare
- Enrolment & Onboarding Policy – eligibility, right to work checks and initial assessment
- Learner Support Policy – identification and support for vulnerable apprentices
- Modern Slavery Act 2015
- Home Office Modern Slavery: Statutory Guidance for England and Wales
- DfE Apprenticeship Funding Rules 2025/26

Designated Person and Responsibilities

The Managing Director is the designated senior leader with overall accountability for this policy, including ensuring adequate resources, staff competence and effective implementation.

The Designated Safeguarding Lead (DSL) is the operational lead responsible for receiving and acting on modern slavery concerns. The DSL will:

- Act as the primary point of contact for any modern slavery concern raised by staff, apprentices or third parties
- Make referrals to the police, the National Referral Mechanism (NRM) or local authority as appropriate
- Maintain confidential records of all concerns and actions taken
- Ensure relevant information is shared with statutory partners in accordance with data protection legislation
- Report to the Managing Director on the nature and volume of concerns at least annually

All staff are responsible for reading, understanding and complying with this policy, completing required training, and raising concerns without delay.

Forms of Modern Slavery

Modern slavery encompasses:

- **Slavery** – the ownership or control of a person, depriving them of their freedom
- **Servitude** – the obligation to provide services imposed by coercion
- **Forced or compulsory labour** – work or service extracted under the threat of a penalty and for which the person has not offered themselves voluntarily
- **Human trafficking** – arranging or facilitating the travel of a person with a view to their exploitation

Exploitation can include sexual exploitation, forced labour, domestic servitude, organ harvesting, criminal exploitation (including county lines) and debt bondage.

Recognising the Signs

Staff and apprentices should be alert to indicators that a person may be a victim of modern slavery. No single indicator is proof, but a combination should prompt further enquiry. Indicators include:

- Appearing malnourished, unkempt, anxious, withdrawn or frightened
- Signs of physical abuse, injury or untreated medical conditions
- Being accompanied or controlled by another person who speaks on their behalf or collects their wages
- Living in overcrowded, unsanitary or insecure accommodation
- Having no access to personal identification documents
- Working excessively long hours with little or no pay
- Being unable to freely contact family or friends, or having restricted movement
- Appearing unfamiliar with the local area or unable to confirm their home address
- Reluctance to seek help or distrust of authorities
- Sudden changes in behaviour, attendance or engagement

In the context of online delivery, staff should be attentive to signs observed during video calls, one-to-one sessions and progress reviews, such as a third party visibly present or controlling the conversation, the apprentice appearing unable to speak freely, or repeated unexplained absences.

Reporting Concerns

Any person who suspects that modern slavery may be taking place must report their concern immediately to the DSL. Concerns may also be reported directly to the Managing Director. Where a concern involves the DSL, it should be reported to the Managing Director.

The reporting procedure is set out in the Safeguarding Policy. The DSL will assess the concern and, where appropriate:

- Contact the police on 999 if there is an immediate risk to life
- Refer to the police on 101 for non-emergency concerns
- Make a referral to the National Referral Mechanism via the Modern Slavery Helpline (08000 121 700) or local authority First Responder
- Make a safeguarding referral to the relevant local authority

Staff must not attempt to investigate concerns themselves or alert a suspected perpetrator. All concerns and actions taken are recorded confidentially and retained in accordance with DRL's data retention policy.

Apprentices and members of the public can report concerns directly via:

- Modern Slavery Helpline: 08000 121 700
- Online: www.modernslaveryhelpline.org
- In an emergency: 999

Whistleblowing

DRL encourages openness and will support anyone who raises a genuine concern in good faith, even if the concern turns out to be mistaken. No person will suffer any detrimental treatment - such as dismissal, disciplinary action, threats or other unfavourable treatment - as a result of reporting a suspected breach. Any such treatment should be reported immediately to the Managing Director.

Supply Chain Due Diligence

DRL is committed to ensuring that modern slavery does not occur within its supply chain. As part of its procurement and contracting processes, DRL will:

- Include specific contractual prohibitions against the use of forced, compulsory or trafficked labour in all supplier and subcontractor agreements
- Require suppliers and subcontractors to confirm their compliance with the Modern Slavery Act 2015 before entering into a business relationship
- Conduct proportionate due diligence on new suppliers and periodically on existing suppliers, taking account of the nature and risk profile of the goods or services provided
- Reserve the right to terminate any relationship with a supplier or subcontractor found to be involved in or complicit with modern slavery

DRL assesses itself to have a low risk of modern slavery within its direct operations due to the nature and scale of its business. However, this assessment is reviewed annually and whenever there is a material change to the supply chain.

Recruitment and Employment Practices

DRL's recruitment and employment practices are designed to safeguard against modern slavery. Eligibility to work in the UK is verified for all staff at the point of recruitment and set out in the Recruitment Policy, and for all apprentices at enrolment as set out in the Enrolment & Onboarding Policy. DRL does not use recruitment agencies that cannot demonstrate compliance with the Modern Slavery Act 2015.

DRL does not require staff or apprentices to surrender personal identification documents, does not charge fees for employment or training, and ensures all staff are paid at least the applicable minimum wage.

Staff Training

All staff receive training on modern slavery awareness as part of their induction, including how to recognise the indicators, how to report concerns, and the protections available to whistleblowers. This forms part of the broader safeguarding training programme set out in the Safeguarding Policy.

Training is refreshed at regular intervals and whenever there is a material change to legislation, guidance or this policy. Completion is recorded on the staff training matrix and monitored by the DSL.

Apprentice Awareness

Apprentices are made aware of modern slavery during induction and at regular intervals throughout their programme as part of safeguarding and British values content. This includes how to recognise the signs, how and where to report concerns, and the support available to victims. Awareness is reinforced during progress reviews and through embedded content within the curriculum.

Breach of This Policy

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. DRL may terminate its relationship with any individual, supplier or organisation that breaches this policy.

Compliance, Monitoring and Review

This policy is reviewed at least annually and following any significant change to legislation, guidance or DRL's operations. The Managing Director is responsible for ensuring the policy remains current and effective. The review considers the adequacy of training, the volume and nature of any concerns raised, the effectiveness of supply chain due diligence, and feedback from staff and apprentices.

Policy Record Details

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