



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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1. Introduction to the Policy

This policy sets out the framework, principles, and procedures that **Byram House** follows to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own business, its supply chains, or in the care it provides to children and young people.

The Home is Byram House, which comprises the two residences at 62 Deighton Road and 66 Deighton Road. This policy applies equally across both residences and to all staff, volunteers, agency workers, contractors, and anyone acting on behalf of the home.

As part of the social care sector, Byram House recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This policy sets out the home's absolute commitment to preventing slavery and human trafficking activities and to ensuring that its supply chains are free from slavery and human trafficking.

The objectives of this policy are to:

- Ensure compliance with all relevant legislation, including the **Modern Slavery Act 2015** (as amended), the **Nationality and Borders Act 2022**, the **Illegal Migration Act 2023**, and the **Employment Rights Act 2025**.
- Protect children and young people in our care from the risks of modern slavery and human trafficking.
- Ensure our recruitment practices are robust and that we do not support any form of forced labour or human trafficking in our supply chains.
- Provide staff with clear definitions, responsibilities, and reporting pathways.
- Promote a culture of vigilance and open reporting.

2. How this Policy Benefits the Home

This Anti-Slavery and Human Trafficking Policy benefits Byram House in the following ways:

- **Legal Compliance** – It ensures the home meets the requirements of the **Modern Slavery Act 2015** (including Section 54 transparency in supply chains), the **Nationality and Borders Act 2022** (Section 63 public order disqualification provisions), the **Illegal Migration Act 2023** (disapplication of modern slavery provisions under Section 29), the **Employment Rights Act 2025** (worker protections), and the **Working Together to Safeguard Children 2026**.
- **Child Protection** – It embeds modern slavery awareness into safeguarding practice, ensuring that staff can identify potential victims and respond appropriately, in line with the **SCCIF 2026** focus on children’s lived experience and understanding each child’s identity and communication.
- **Safer Recruitment** – It strengthens safer recruitment practices to prevent the employment of staff through forced labour or trafficking, including the use of specified reputable employment agencies, verification of eligibility to work, and DBS checks.
- **Supply Chain Integrity** – It sets out expectations for suppliers to provide details of their own anti-slavery policies and to meet ethical standards, reducing the risk of forced labour in products or services used by the home.
- **Staff Protection** – It provides a clear whistleblowing pathway for staff to report concerns, with protection from detriment under the **Employment Rights Act 1996** (as amended by the **Public Interest Disclosure Act 1998** and the **Employment Rights Act 2025**).
- **Training Framework** – It sets out regular training for all staff on modern slavery identification, reporting, and prevention.
- **Inspection Readiness** – The **SCCIF 2026** and Ofsted expectations require homes to demonstrate safe recruitment, safeguarding practice, and a culture of vigilance. This policy evidences that commitment.

3. Definitions & Legislation

3.1 Definitions

Term	Definition
Home	Byram House, the children’s home registered with Ofsted, comprising two residences at 62 Deighton Road and 66 Deighton Road.
Company	IMS Care LTD, the registered provider and legal entity responsible for operating Byram House.
Byram House	The name used throughout this policy to refer to the home and its staff.
Modern Slavery	The recruitment, movement, harbouring, or receiving of children or adults through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.
Human Trafficking	The action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labour or sexual exploitation.
Forced Labour	Work or service extracted from a person under the threat of penalty and for which the person has not offered themselves voluntarily.
Child Trafficking	The recruitment, transportation, transfer, harbouring, or receipt of a child under 18 for the purpose of exploitation, even if this does not involve coercion or deception (as the child cannot consent).
National Referral Mechanism (NRM)	The UK’s framework for identifying and supporting victims of modern slavery and human trafficking.

First Responder	An organisation (including children’s homes) authorised to refer potential victims to the NRM.
Public Order Disqualification (POD)	A provision under Section 63 of the Nationality and Borders Act 2022 that allows a competent authority to disqualify a person from modern slavery protections if they are deemed a threat to public order.
Reasonably Practicable	The standard for acting on suspicion of modern slavery, meaning “would a reasonable person in the same situation suspect that a person is a victim?”.
Section 45 Defence	A statutory defence under the Modern Slavery Act 2015 that protects victims of modern slavery from prosecution for certain offences committed as a direct result of their exploitation.
Section 54 Statement	A requirement under the Modern Slavery Act 2015 for certain organisations to publish an annual slavery and human trafficking statement detailing steps taken to prevent modern slavery in their business and supply chains.
Section 48 ICTG Service	Section 48 of the Modern Slavery Act 2015 established the national Independent Child Trafficking Guardians (ICTG) service for child victims of trafficking in England and Wales.

3.2 Key Legislation and Statutory Guidance

Legislation / Guidance	Key Provisions	Relevance to this Policy
Modern Slavery Act 2015 (MSA 2015)	The primary legislation for England and Wales, consolidating and strengthening	Forms the legal foundation for this policy. Byram House must ensure

	<p>previous slavery and trafficking offences. Key sections include: Section 1 (slavery, servitude and forced or compulsory labour), Section 2 (human trafficking), Section 45 (statutory defence for victims), Section 48 (provision of Independent Child Trafficking Guardians, ICTGs, for child victims), Section 52 (maritime enforcement powers), Section 54 (transparency in supply chains, requiring organisations with turnover of £36m or more to publish slavery statements), Section 61 (independent anti-slavery commissioner), and Section 71 (national referral mechanism, NRM).</p>	<p>compliance with the statutory defence provisions (s.45) where a child in our care is also an offender, and with the duty to refer to the NRM. The home must also be aware of the transparency requirements that apply to IMS Care LTD.</p>
<p>Modern Slavery Act 2015 (Code of Practice) Regulations 2016</p>	<p>Brings into force a code of practice for English and Welsh constables and enforcement officers when arresting a person under the maritime enforcement powers conferred by Schedule 2 to the Act.</p>	<p>Relevant where there is suspected maritime involvement in trafficking of a child in our care; enforcement officers must follow the code.</p>
<p>Nationality and Borders Act 2022 (NABA 2022)</p>	<p>Section 63 – Introduces the ‘public order disqualification’ (POD), allowing a competent authority to disqualify a person from modern slavery protections if they are deemed a</p>	<p>Byram House staff must be aware that a child in our care may be disqualified from certain protections under s.63. Staff should advocate for</p>

	<p>threat to public order. The Home Secretary may exclude a “reasonable grounds” victim from accessing recovery support. Section 59 – Restrictions on modern slavery protections. Schedule 4 – Amendments to the MSA 2015 creating rebuttable presumptions regarding the s.45 defence.</p>	<p>the child’s best interests and seek legal advice where necessary.</p>
<p>Illegal Migration Act 2023 (IMA 2023)</p>	<p>Section 29 – Disapplies certain modern slavery protections (including those under MSA 2015 and NABA 2022) for persons who entered the UK illegally and who meet prescribed conditions.</p>	<p>Where a child in our care arrived in the UK illegally, standard modern slavery protections may not apply. The home must ensure that the child’s legal team is aware, and that safeguarding remains the priority.</p>
<p>Employment Rights Act 1996 (as amended by Public Interest Disclosure Act 1998)</p>	<p>Provides protection from dismissal or detriment for employees who make a ‘qualifying disclosure’ (whistleblowing) in the public interest, including disclosures about modern slavery or trafficking.</p>	<p>Staff who report concerns about modern slavery in the home’s operations or supply chains are protected from victimisation.</p>
<p>Employment Rights Act 2025</p>	<p>Effective 6 April 2026. Amends the 1996 Act to include sexual harassment as a protected disclosure category. Also introduces a duty for employers to take reasonable steps to investigate protected disclosures.</p>	<p>From 6 April 2026, reports of sexual harassment (including in the context of trafficking for sexual exploitation) will be protected. The home must</p>

		ensure investigation of any disclosure.
Data Protection Act 2018 & UK GDPR	Governs the processing of personal data, including sensitive information relating to a child's status as a potential victim of trafficking.	Information about a child's modern slavery status is sensitive personal data. The home will process it in accordance with data protection principles, and it is not a barrier to sharing for safeguarding purposes.
Working Together to Safeguard Children 2026	Published March 2026. Strengthens multi-agency accountability and anti-discriminatory practice. The SCCIF 2026 reinforces the focus on children's lived experience, identity, and communication.	Modern slavery identification is a safeguarding matter. The home must work within the local safeguarding partnership to ensure that potential victims are identified, referred to the NRM, and supported appropriately.
Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026	Effective 1 April 2026. Focuses on children's lived experience and how well staff understand each child.	Inspectors will evaluate whether staff are alert to signs of modern slavery and whether the home has robust systems to identify and support potential victims.
Border Security, Asylum and Immigration Bill (progressing)	Introduced in 2025, this bill proposes to establish a new Border Security Command and contains provisions affecting modern slavery protections, including potential	As the bill progresses, Byram House will monitor its impact. The home will continue to prioritise the welfare of child victims regardless of changes.

through Parliament)	removal of protections for victims coerced into criminality.	
Statutory guidance: “Modern slavery: how to identify and support victims” (Home Office, updated 2026)	Provides detailed guidance on identifying signs of modern slavery, support available, and the NRM process. Updated February 2026.	Staff must follow this guidance when they suspect a child or adult may be a victim. The home will make this guidance available to all staff.
CPS Prosecution Guidance: Modern Slavery and Human Trafficking Offences	Sets out the approach to prosecuting modern slavery offences and the application of the s.45 statutory defence.	Relevant where a child in our care is also an offender and may be entitled to the s.45 defence. Staff should advocate for the child to be treated as a victim first.
Independent Child Trafficking Guardians (ICTG) Statutory Guidance (Sections 48–51 MSA 2015)	Establishes the national ICTG service for child victims of trafficking, providing independent support and representation to ensure their voice is heard in decision-making.	Byram House must know how to refer a child to the ICTG service and must support the child in accessing an ICTG. The home must also recognise that failure to appoint an ICTG where required may be open to legal challenge.

4. The Policy

4.1 Statement of Commitment

Byram House is absolutely committed to zero tolerance of slavery and human trafficking in any part of its business or supply chains. We will take proactive steps to identify, prevent, and respond to any form of modern slavery, including forced labour, child trafficking, forced criminality, domestic servitude, and sexual exploitation.

This commitment applies to:

- All staff, agency workers, volunteers, and contractors working for Byram House.
- All children and young people placed in our care.
- All goods, services, and products procured by the home, including cleaning, catering, maintenance, IT, and administration supplies.
- All recruitment agencies and employment practices.

We recognise that children in residential care may be particularly vulnerable to trafficking and exploitation. We are committed to ensuring that our staff are trained to identify the signs of modern slavery and to respond appropriately, in line with the **Working Together to Safeguard Children 2026** and the **SCCIF 2026** guidance.

4.2 Scope – Our Business and Supply Chains

Our business: Byram House is a children’s residential home providing care for up to 6 children across two residences (62 and 66 Deighton Road). We directly employ all our care staff and managers. We do not use forced labour, child labour, or any form of coerced employment.

Our supply chains: Due to the nature of our business, we have a modest supply chain to ensure our needs in terms of administration, IT, cleaning, maintenance, catering, and utilities are properly met. Our supply chain is rationalised where possible, and our procurement manager and property team have oversight where appropriate.

We require that:

- Our suppliers are able to provide details of their own anti-slavery policies.
- Suppliers, as a minimum, meet national laws and include human rights principles regarding child labour and bonded or forced labour.
- Where possible, products meet ethical standards of supply (e.g., Rainforest Alliance, PEFC, FSC, Fairtrade, or sustainably certified food ingredients principally UK or EU sourced).

If we become aware of any contradiction to these practices in our supply chain, we will immediately investigate and, if confirmed, disengage from that supplier.

4.3 Responsibilities

Role	Responsibilities
Directors and Responsible Individual	<ul style="list-style-type: none"> – Implement this policy statement and its objectives. – Provide adequate resources and investment to ensure slavery and human trafficking is not taking place within Byram House or its supply chains. – Approve the annual modern slavery statement (Section 54 MSA 2015) for the company. – Ensure that any public order disqualification (POD) decisions affecting a child in our care are challenged appropriately.

Registered Manager	<ul style="list-style-type: none"> – Ensure all staff understand and apply this policy. – Oversee safer recruitment practices in line with Regulation 34 of the Children’s Homes Regulations 2015. – Ensure that any suspicion of modern slavery is referred to the NRM and to the local authority safeguarding team. – Maintain a register of supplier anti-slavery statements.
All Staff	<ul style="list-style-type: none"> – Understand the signs of modern slavery and human trafficking. – Report any suspicion of modern slavery immediately to the Designated Safeguarding Lead. – Co-operate with any investigation arising from a disclosure. – Never victimise or retaliate against an individual who raises a concern.
HR and Recruitment	<ul style="list-style-type: none"> – Ensure that all recruitment is conducted in accordance with the Safer Recruitment Policy and that no agency workers are sourced from agencies known to use forced labour. – Verify the eligibility to work in the UK of all employees (birth certificate, passport, National Insurance number). – Ensure any concerns about recruitment agencies are escalated to the Directors.

4.4 Recruitment and Safer Employment Practices

Byram House uses only specified, reputable employment agencies to source labour. It is a reasonable expectation that any agency used would treat their employees in a fair manner and in line with all relevant legislation (including the **Employment Rights Act 1996** and the **Modern Slavery Act 2015**).

Our safeguards to ensure we do not support wrongful practices include:

- Promoting transparent and open reporting.
- Making agencies aware of our safer recruitment practices and ensuring the correct checks (DBS, reference, eligibility) are carried out.
- Engaging in the fair payment of rates to the agency for workers.
- Where Byram House becomes aware of any contradictions to these practices, it will immediately disengage from that agency.

Our recruitment processes are strict and comply fully with regulatory guidelines and safer recruitment for those working with children.

All employment offers are made conditional upon receipt of:

- Satisfactory references.
- Confirmation of eligibility to work in the UK (birth certificate/passport and National Insurance number).
- Enhanced DBS check (with children's barred list).
- Other criteria as set out in the Safer Recruitment Policy.

No fees are paid to employees or agencies that would indicate forced labour.

4.5 Employee Code of Conduct and Raising Concerns

The Byram House **Code of Conduct** makes clear to employees the actions and behaviours expected of them when representing the home. The home strives to maintain the highest standards of employee conduct and ethical behaviour.

Staff are encouraged to speak up about:

- Unethical behaviour.
- Wrongdoing or behaviours they think go against this policy or other company values.

- Suspicion that a colleague, agency worker, contractor, or supplier is involved in modern slavery or human trafficking.

Every employee is given information about the **NWG Network** (a UK charity providing resources for organisations concerned with child sexual exploitation and modern slavery) and the **Modern Slavery Helpline: 08000 121 700** (www.modernslaveryhelpline.org).

Whistleblowing protection: Staff who raise a concern in good faith under this policy are protected from detriment or dismissal under the **Public Interest Disclosure Act 1998** and the **Employment Rights Act 1996** (as amended by the **Employment Rights Act 2025**). Where the concern relates to sexual harassment (e.g., trafficking for sexual exploitation), protection applies from 6 April 2026.

4.6 Supply Chain Management

Byram House's supply chain is modest, but we take our responsibilities seriously.

Our expectations of suppliers:

- Suppliers must provide details of their own anti-slavery policies upon request.
- Suppliers must, as a minimum, meet all national laws regarding forced labour, child labour, and human trafficking.
- Where possible, suppliers used should be accredited by recognised ethical standards (e.g., Rainforest Alliance, PEFC, FSC, Fairtrade).

We are of the opinion that our current supply chain is compliant in these matters. However, if any staff member becomes aware of a contradiction, they must report it to the Registered Manager. The Registered Manager will investigate and, where a concern is substantiated, will escalate to the Directors and disengage from the supplier.

4.7 Identifying and Responding to Modern Slavery in Our Care

Children in residential care may be vulnerable to modern slavery and human trafficking. Staff must be alert to the signs, which may include:

- Unexplained absences or going missing from the home (especially to unknown locations).
- New or unexplained possessions, money, or clothing.
- Fearful, withdrawn, or anxious behaviour, especially around certain adults.
- Signs of physical abuse or restraint.
- Receiving frequent or unexplained visitors.
- Being accompanied by adults who do not appear to be family members.
- Being reluctant to provide details about where they have been or who they have been with.
- Having false identity documents.
- For older children, being coerced into criminal activity (e.g., drug running, theft) or sexual exploitation.

If a staff member suspects that a child in our care is a victim of modern slavery or trafficking:

1. **Immediate safety** – Ensure the child is safe and not at immediate risk. If there is immediate danger, call 999.
2. **Report to the Designated Safeguarding Lead (DSL)** immediately (verbally and in writing the same day).
3. The DSL will:
 - Refer the child to the **National Referral Mechanism (NRM)** as a first responder.
 - Notify the local authority MASH (Kirklees Front Door Safeguarding Hub) within one working day.
 - Consider whether the child is eligible for an **Independent Child Trafficking Guardian (ICTG)** under Section 48 of the Modern Slavery Act 2015, and refer accordingly.
 - Ensure that the child is not subjected to public order disqualification (POD) without proper legal representation and challenge.
 - Where the child has allegedly committed an offence as a direct consequence of exploitation, advocate for the **Section 45 statutory defence** under the Modern Slavery Act 2015.

4. **Record keeping** – All actions must be recorded on the child's file, including NRM referral, ICTG referral, and any POD decisions.

Staff must never attempt to confront a suspected trafficker or remove a child from a suspected trafficker without police involvement.

4.8 Training and Awareness

All staff receive training on modern slavery and human trafficking as part of their safeguarding training. This includes:

- Recognising the signs of modern slavery in children.
- Understanding the NRM process and how to act as a first responder.
- Understanding the ICTG service and how to refer.
- Understanding the Section 45 statutory defence.
- Understanding the public order disqualification provisions and how to challenge them.
- Knowing how to raise concerns internally and externally (including via the Modern Slavery Helpline).

Training is provided at induction and refreshed annually.

All staff are provided with the contact details of the **Modern Slavery Helpline** (08000 121 700) and the **NWG Network** (www.nwgnetwork.org).

4.9 Monitoring and Review

This policy will be reviewed annually by the Registered Manager and Responsible Individual, or more frequently if changes in legislation or practice require it.

Monitoring activities include:

- Annual review of supplier anti-slavery statements.
- Review of NRM referrals and outcomes where a child in our care has been referred.
- Review of any training gaps identified in staff annual appraisals.
- Quarterly review by the Regulation 44 independent visitor of the home's compliance with this policy.

The Company will produce an annual **Section 54 Modern Slavery Statement** (if IMS Care LTD meets the turnover threshold of £36m or more) and will make it publicly available.

5. How the Home Trains its Staff About this Policy

Byram House provides structured training to ensure all staff understand and can implement this Anti-Slavery and Human Trafficking Policy effectively.

Training Element	Frequency	Method / Content
Induction	Upon appointment	Face-to-face training covering: definitions of modern slavery and human trafficking, the Modern Slavery Act 2015, key sections (s.45, s.48, s.54), the NRM process, the ICTG service, the s.63 public order disqualification, signs of modern slavery in children, reporting pathways, the whistleblowing process, the Modern Slavery Helpline, and the dual-site operation (62 & 66 Deighton Road).
Annual refresher	Every 12 months	Classroom or virtual session covering updates to legislation (Employment Rights Act 2025, Border Security Bill, SCCIF 2026,

		Working Together 2026), changes to the NRM, case studies, and lessons learned from referrals made during the year.
First responder training	At induction and biennially	Accredited NRM first responder training, including how to complete the NRM referral form, what constitutes reasonable grounds, and the duty to refer.
ICTG awareness	Annually	Training on the ICTG service, eligibility criteria, and how to request an ICTG for a child victim.
Section 45 defence	Annually	Training on the s.45 statutory defence, the difference between duress and s.45, and how to advocate for a child who is also an offender.
Public order disqualification	Annually	Training on s.63 NABA 2022, the POD process, and how to challenge a POD decision where it is not in the child's best interests.
Record keeping and data protection	At induction and refresh	Training on complying with UK GDPR when handling modern slavery-related information, storing NRM documents securely, and sharing information appropriately.

Staff are required to:

- Read and sign this policy annually.
- Complete all mandatory training sessions.
- Know the signs of modern slavery and how to report concerns.
- Never victimise or retaliate against a colleague who raises a concern in good faith.

6. Related Policies and Guidance

This policy must be read in conjunction with:

- Safeguarding Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Employee Code of Conduct
- Missing From Care Policy
- Equality and Diversity Policy
- Data Protection Policy
- Children's Homes (England) Regulations 2015
- Working Together to Safeguard Children 2026
- Social Care Common Inspection Framework (SCCIF) for Children's Homes 2026
- Local safeguarding partnership procedures (Kirklees)
- Statutory guidance: "Modern slavery: how to identify and support victims" (Home Office, updated February 2026)

7. Policy Approval and Review Details



Policy Name	Anti Slavery Policy	
Home	Byram House	
Reviewed by	Danyaal Iqbal / Mustafa Amin	Deputy Manager / Registered Manager
Approved by	Stacey Wagstaffe	Responsible Individual
Date	May 2026	