

# The Patch Project | Human Trafficking and Exploitation Policy

**Policy Approved By:** Hazel Goodier

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**Review Date:** September 2026

**Designated Safeguarding Lead:** Hazel Goodier

**Deputy Designated Safeguarding Lead:** Emily Pulletz

## Policy Statement

The Patch Project is committed to safeguarding and promoting the welfare of all children and young people in our care. This policy sets out our approach to preventing, identifying, and responding to human trafficking, modern slavery, and child exploitation. We recognise that schools and education settings play a critical role in identifying victims and potential victims of trafficking and ensuring timely intervention. The Patch Project as part of the education sector, recognises its responsibility towards taking a robust approach to slavery and human trafficking.

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## Legal and Statutory Framework

This policy is guided by the following legislation and statutory guidance:

- **Modern Slavery Act 2015**
  - **Children Act 1989 and 2004**
  - **Keeping Children Safe in Education (KCSIE)** (DfE, 2023)
  - **Working Together to Safeguard Children** (HM Government, 2023)
  - **UN Convention on the Rights of the Child**
  - **DfE's Child Exploitation Guidance**
  - **Prevent Duty Guidance**
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## Definitions

### Human Trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, use of force, coercion, abduction, fraud, deception, abuse of power, or giving payments to achieve the consent of a person for the purpose of exploitation.

**Exploitation Includes:**

- Sexual exploitation
- Forced labour or services
- Slavery or servitude
- Criminal exploitation (e.g. county lines)
- Domestic servitude
- Organ harvesting

A child (under 18) is considered trafficked even if there is no evidence of force or coercion.

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**Organisational structure and supply chains**

The Patch Project is an alternative education setting based in Branscombe, Devon, serving students aged 11-16 years of age. The Patch Project's educational and business activities are delivered wholly within the UK and it is a predominately a service-based organisation. The Patch Project procures goods and services from providers predominantly based within the UK.

**Responsibility for the organisation's anti-slavery initiatives is as follows:**

- Policies and Risk Assessments:** The Founder & Programme Development Lead are responsible for putting in place and reviewing policies and the processes by which they were developed. In addition, they are responsible for the broader organisational responsibility for human rights and modern slavery risk analysis.
- Investigations/due diligence:** Where a need for further due diligence or investigation are required, in relation to known or suspected instances of slavery and human trafficking relevant to their sphere of responsibility, these will be led and supported by the Founder and the leadership teams, Designated Safeguarding Leads, the central professional services teams.
- Curriculum and Education:** Teaching students about online safety, healthy relationships, and risk awareness & Promoting resilience and self-protection.
- Staff Training.** Annual safeguarding training includes specific guidance on recognising signs of trafficking, criminal and sexual exploitation. DSL and deputies receive enhanced safeguarding and contextual safeguarding training.

- e) **Safer Recruitment and Premises Security.** All staff and volunteers are enhanced DBS-checked. Visitors are supervised and sign in/out. Staff follow our safeguarding and child protection procedures rigorously.
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## Identification: Signs and Indicators

Staff should be alert to signs that a child may be trafficked or exploited, including:

- Unexplained absences or persistent truancy.
  - Evidence of physical abuse or neglect.
  - Appearing fearful, anxious, or overly controlled.
  - Possession of expensive items or large sums of cash.
  - Changes in behaviour, dress, or friends.
  - Being picked up/dropped off by unknown adults.
  - Disclosure or third-party reports.
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## Procedures for Responding to Concerns

### a. Reporting

Any member of staff who suspects a pupil is at risk of trafficking or exploitation must:

1. **Immediately inform the Designated Safeguarding Lead (DSL)** or deputy.
2. **Record concerns factually** to the DSL or DDSL

### b. DSL Responsibilities

The DSL will:

- Assess the risk and consider the *Contextual Safeguarding* around the child.

- Contact **Children's Social Care** and/or the **National Referral Mechanism (NRM)** if trafficking is suspected.
  - Liaise with police or the **Child Exploitation and Online Protection (CEOP)** Centre where appropriate.
  - Keep accurate and confidential records.
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## Support for Victims

We are committed to supporting affected students through:

- Ongoing emotional and pastoral support.
  - Counselling referrals (internal or external).
  - Academic flexibility and reintegration support.
  - Involving appropriate external agencies (e.g. social workers, NGOs).
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## Confidentiality and Information Sharing

Concerns are handled with sensitivity, but safeguarding duties override confidentiality. Information will be shared with relevant agencies on a **need-to-know basis**, in line with **GDPR** and **safeguarding protocols**.

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## 10. Monitoring and Review

- This policy is reviewed **annually** or when significant changes in guidance or law occur.
- The DSL is responsible for ensuring staff are updated on any changes.
- Regular safeguarding audits will include monitoring of this policy's effectiveness.