



**BEYOND LIMITS**  
Beyond the limits of conventional support

# Modern Slavery Handbook

**Spotting the Signs and Reporting Guidelines**

March: 2025

Review: March 2026



## THE BACKGROUND

The Modern Slavery Act is legislation that was passed by the British Government in 2015 and has been introduced to protect people against slavery and servitude. It was put in place to eliminate the risk of Modern-Day slavery in business operations and global supply chains.

The Act will protect and help those that are victims of slavery and will impose heavy sentences on those that are found guilty of committing these crimes. The maximum prison sentence for those guilty under the Modern Slavery Act is life imprisonment.

The Act covers three main areas:

Slavery, servitude & forced compulsory labour.

Human Trafficking

Worker exploitation

Modern Slavery is a serious and terrible crime in which people are treated as commodities and exploited for criminal gain. This crime can take many forms including the trafficking of people, forced labour, servitude, and slavery. Often victims are unwilling to come forward to disclose their poor treatment, because sometimes they fear further reprisals from their abusers, or they do not recognise themselves as victims.

Where there is an opportunity for exploiters to infiltrate organisations by sending in individuals to take on work placements controlled by the exploiters, they will try and operate.

Beyond Limits is committed to informing all our team members about what Modern Slavery is and how we can help by developing and adopting a proactive approach to identify signs of exploitation, prevent it, and respond to it effectively, protecting the potential victims and associated business partners and families at every step.

We recognise that we can have a positive impact to raise awareness of Modern Slavery throughout our organisation, protect the people we support, staff and report concerns to the Gangmasters Labour abuse authority and/or local Police force.

As part of this learning, we kindly ask that you complete the Modern Slavery e-learning course and watch the [GLAA Help Video](#) This handbook accompanies our Modern Slavery and Human Trafficking policy.

Following the guidelines in this handbook will help you:

- Demonstrate a responsibility to prevent Modern Slavery
- Promote a proactive ethos to look out for the welfare of colleagues and be vigilant to the risks of Modern Slavery.
- Engage with business partners and external regulators/ enforcement authorities to work together to help eradicate exploitation.

## THE DEFINITION

Modern Slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

Forced Labour is all work or service that is exacted from any person under the menace of any penalty and for which that person has not offered himself voluntarily.

Debt-bonded labour is where a person's work is demanded as a means of repayment for a loan or service.

Human Trafficking is the recruitment & transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another for the purpose of exploitation.

Hidden labour exploitation involves the exploitation of workers by other individuals without the sanction or explicit knowledge of the employer. It includes forced labour and Human Trafficking for labour exploitation, payment for work finding and other work-related services. The term 'Hidden' comes from this crime quite often being well hidden by the perpetrators, and with potential victims being reluctant to come forward to disclose concerns of their treatment.

## MANAGING THE RISKS

As well as being alive to look out for the signs of exploitation within our own business, we understand that applying due diligence in advance of any engagements we enter with 3<sup>rd</sup> parties is equally important to managing the risk through our partnerships.



One of the biggest risks occurs when we use resourcing partners based overseas to help with our recruitment process. In line with this, all recruitment partners, and associated processes and procedures linked with the recruitment of people from overseas are checked and approved with some audits completed.

We expect all external business suppliers to familiarise themselves with our Modern Slavery and Human Trafficking policy and operate themselves in a manner which supports our methodology and vision of eliminating the exploitation of people under the Modern Slavery Act 2015.

At Beyond Limits we recognise that often the act of Modern Slavery can take place with individuals before they come to us, whether it be for the people we support or our staff. Some of the people we support may pose a higher risk to being targeted by criminals due to some vulnerabilities such as learning difficulties, mental illness etc.

For our staff it is vital that we check with all our applicants that they have not paid any fees for the work with us here, or for anywhere else in the UK, or are being forced/coerced to take the role by an outsider and are therefore being exploited.

For everyone associated with us, having the right mindset, effective communication routes, and due diligence checks in place are critical. Keeping everyone safe is at the heart of our organisation.

## SPOTTING THE SIGNS

Victims of Modern Slavery are often difficult to spot. They don't wear chains and may appear to be going about their normal lives, but please look closer when you are interacting with people every day.

Be aware of unusual behaviours, or negative changes to people that you know. Reach out and check in on them. Shown below are some of the main examples of the signs to look out for, it's not an exhaustive list, and victims may show one or more of these signs.

Allow others to speak for them when addressed directly.

Signs of physical untreated injuries.

Show signs that their movement may be being controlled.

Show fear or anxiety.

Appear scruffy wearing the same clothes every day and/or malnourished.

Limited or no social interaction and limited contact with their families.

Work long hours and never take holiday time off, appearance of looking tired a lot.

Victims act as if instructed by someone else.

If you are at all unsure of your feelings when spotting one of these signs, then please raise your concern, it's better to do so than forget about it, you could be changing or even saving someone's life.

To help, staff can follow and remember the five steps below:

1 Know what to look for

2 If you spot it, report it

3 Have the right checks in place

4 Be vigilant at all times

5 Spread good practice

## IDENTIFYING AND ENGAGING

Whilst the common indicators are often found in cases of Human Trafficking/ labour exploitation, trust your own instincts. If something doesn't feel right, then often it's not, so better to raise a discreet alarm rather than do nothing.

If you suspect an instance of Modern Slavery, then the list below provides a few tips to help engage someone you are worried about in the first instance.

DO'S	DON'TS
<p><u>Make the individual feel at ease.</u></p> <p>Smile, be calm, speak softly, introduce yourself, Explain why you are speaking to them – to make sure they are okay.</p> <p><u>Ask open questions.</u></p> <p>Use the TED model:  <u>T</u>ell me... <u>E</u>xplain to me... <u>D</u>escribe to me...          The more information they disclose, the better.</p> <p><u>Build rapport &amp; trust.</u></p> <p>It is unlikely someone will disclose anything the first time they meet you, start to build a relationship and help them to understand you are there to help <i>if</i> they have any issues in the future.</p> <p><u>Have a 'chat' rather than an interview.</u></p> <p>Keep it informal, by turning it into a chat, puts the person asking the questions at ease as well as the recipient individual and makes them far more comfortable.</p> <p><u>Have a genuine interest in the person and their welfare.</u></p> <p>You need to be careful who you put in front of the worker as they will sense if you genuinely care or are doing it because you must. If they sense you genuinely care, they are more likely to talk.</p>	<p><u>Write down the answers</u></p> <p>If you are having a genuine conversation with someone you shouldn't forget answers, especially if it is something alarming., and if it's not – it won't matter anyway. Keeping notes of a conversation can worry the person in front of you, could make them feel anxious.</p> <p><u>Go into it with the intention to get answers.</u></p> <p>Don't push, tread carefully, if you have a question that needs addressing then just ask once if you don't get the answer, you are looking for, so be it, no need to keep repeating the question.</p> <p><u>Waste too much time before acting.</u></p> <p>It's one thing waiting for the right moment to approach a situation, but missing the opportunity can be precious time lost.</p> <p><u>Only use an office environment</u></p> <p>If you see a worker in the car park, ask how they are getting on/how many hours they are doing at the moment etc. Welfare chats can take place anywhere and at any time.</p> <p><u>Assume that they want to report the crime.</u></p> <p>When you have gathered the relevant information, ask the individual what remediation they are looking for, don't assume that you know what they need. The individual may just need some help with something that you can resolve.</p>

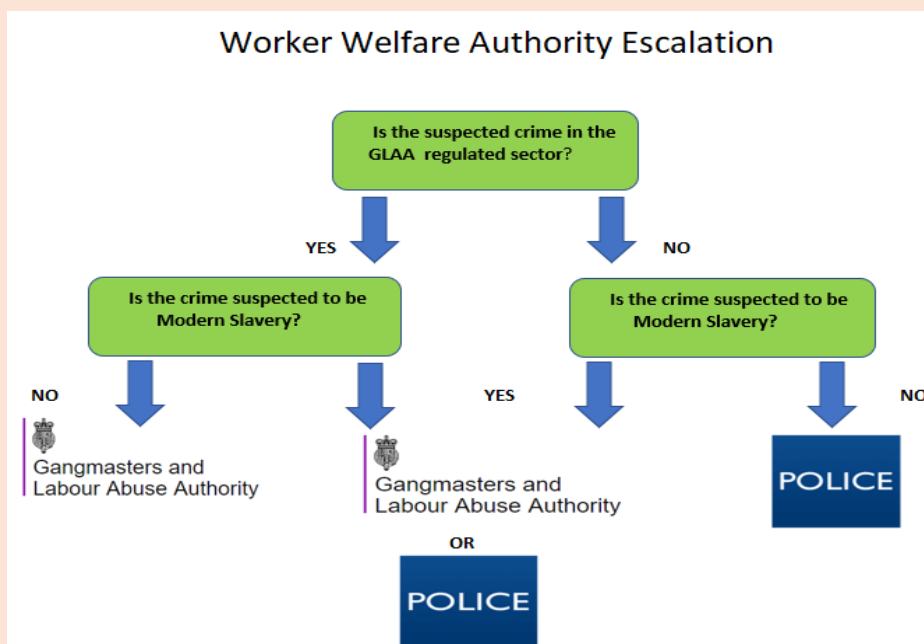
## RESPONSE PLAN

### INTERNAL REPORTING OF WELFARE ISSUES

In all cases where it is found or alleged that a colleague has been potentially harmed and/or exploited or is at risk of being harmed and/or exploited, please inform Rebecca Chadwick – Operations Director in the first instance. In Rebecca's absence, contact the Registered Manager Kathleen Griffiths or a Senior Service Leader. The team will address any such reported concern with the necessary urgency and sensitivity needed to suit the nature of the complaint. They will assess the risk and decide if criminal activity is known to be happening or suspected to be and report externally to the appropriate authorities.

### INVESTIGATION STEPS FOR THE SENIOR TEAM

- 1.) Assess the Risk – If the person is believed to be involved and/or in real and immediate danger, then report to the authorities.
- 2.) Establish Criminality- If the likelihood of criminal activity is known or suspected, report to the authorities.





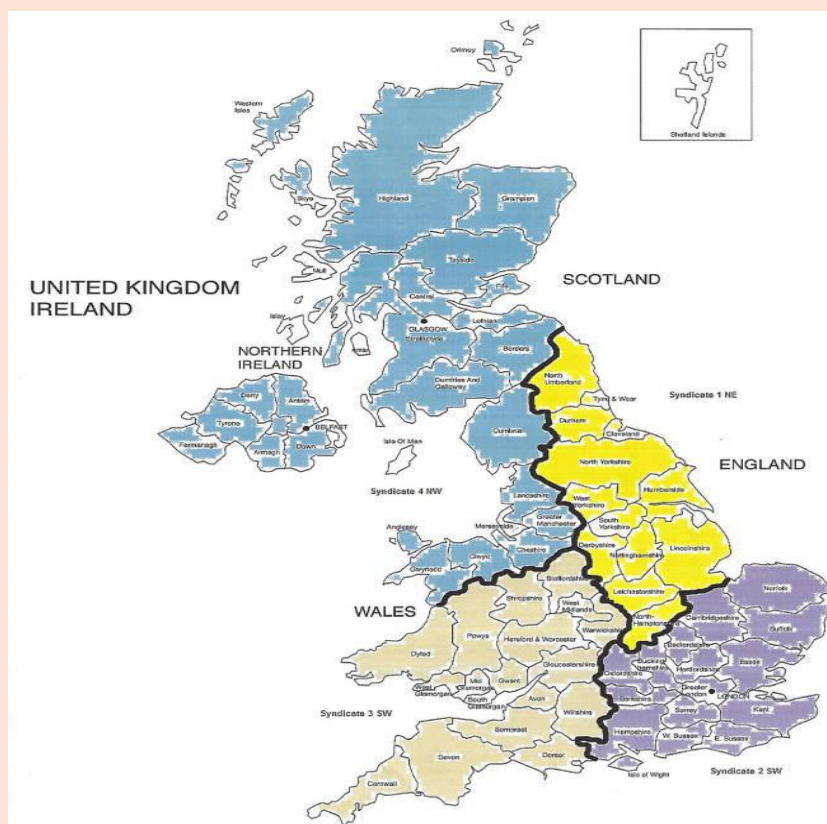
If you are unsure of the facts at this point, then follow the steps below.

- 3.) Observation & Investigation-Establish who is leading and involved in the investigation, define the terms of the investigation, and establish clear 'stop & escalate' boundaries. Gather more information about the potential case through observation, unobtrusive checks, data collection and other methods such as CCTV if possible and relevant. If safe to do so, then approach the individual to conduct a welfare chat if it is considered appropriate.
- 4.) Once more information has been gathered and there is still believed to be a suspected issue, then report in. If there is no suspicious activity or welfare issue present, then the Senior team will record the check completed and reported internally, ask all stakeholders to remain vigilant and monitor the situation, taking no further action at this time.

## GANGMASTERS AND LABOUR ABUSE AUTHORITY (GLAA) CONTACTS

You can find out more information here – [Click this link](#)

**Syndicate 1 (Northeast) Dave Powell – 07825 797111**  
**Syndicate 2 (Southeast) Jenni Baines – 07733 104663**  
**Syndicate 3 (Southwest) Andrew Davies – 07789 459518**  
**Syndicate 4 (Northwest) Martin Plimmer – 07818596397**





Unseen is a UK charity who run the  
Modern Slavery & Exploitation  
Helpline and work with organisations  
And other charities to stamp out Slavery.



An independent crime-fighting charitable  
organisation in the UK. Allows people to  
call anonymously to pass on information  
about crime.

## CONTACTING THE POLICE

If you identify a victim of Modern Slavery/ Trafficking and require immediate assistance, you may decide to call the Police.

**999**

You should **ONLY** call 999 when:

- You or someone else is in immediate danger.
- If the crime is in progress – happening now.
- You need police help immediately.

This could include:

- Someone using violence or threatening violence,
- If there is a danger to life,
- Serious damage is being or could be caused to a property,
- A potential criminal has been disturbed or stopped,
- A road traffic accident where someone is hurt, or a danger is being caused to other road users

## 101

- 101 is the free non-emergency contact number for any police force in England and Wales and it is available 24 hours a day, 7 days a week.
- Using this number can reduce pressure on the 999 system, allowing the police to prioritise emergency calls.
- You should call 101 if you want to talk to your local police officer, get crime prevention advice, or report a crime that does not need an emergency response.

Once the Police have been contacted, ask for an incident number and make a note of it, so you can obtain any updates and provide the police further information.

