MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Published Date:	03/12/2018	Author:	Shabir Siddiq – Operations Manager

Version	Change Detail	Latest Review Date	Date of Next Review	Updated By:
1.0	Annual Review	03/12/2019	03/12/2020	Shabir Siddiq
1.1	Annual Review & Policy Amended	03/12/2020	03/12/2021	Shabir Siddiq
1.2	Annual Review & Policy Amended	07/12/2021	07/12/2022	Shabir Siddiq
1.3	Annual Review & Policy Amended	07/12/2022	07/12/2023	Shabir Siddiq
1.3	Annual Review Changed to Academic Year Start	01/08/2023	31/07/2024	Shabir Siddiq
1.4	Annual Review and name change	01/08/2024	31/07/2025	Shabir Siddiq
1.5	Annual Review & header logos change	01/08/2025	31/07/2026	Shabir Siddiq
1.6	Annual Review & header logos change	01/08/2026	31/07/2027	Shabir Siddiq

INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.
We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2020.

ORGANISATIONAL STRUCTURE

We are a provider of training and apprenticeships in various sectors. Our main focus and delivery base is in the northwest of England.

OUR SUPPLY CHAINS

Our supply chains are not of a huge number and irreverent of this we intend to carry out a supply chain mapping process or risk assessment/analysis in respect of supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our Modern Slavery and Human Trafficking Policy and our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships. We also implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate against such risks we nominate senior representations of the business units and functions, who in turn report to the Director.
We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have a supply chain compliance programme in place.

Furthermore, to ensure all those in our supply chain and contractors comply with our values, we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant county of operations.

We have a supply chain compliance programme in place that is maintained by the relevant account manager or relevant management. This consists of client reviews, audits, and self-certification declarations.

We have a dedicated compliance team, which consists of representatives **OR** involvement from the following departments:

- Legal
- Audit and Compliance
- Human Resources

The compliance team is led by Shakeel Desai – Managing Director.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- The use of grievances mechanisms.
- The level of communication and personal contact with next link in the supply chain.
- The completion of audits.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to continue taking all above steps into the next year.

Signed by Managing Director

01/08/2026