

MODERN SLAVERY POLICY

Contents

Version Control	2
Summary of Changes	3
Purpose.....	3
Statement & Policy	3
Organisation Structure.....	4
Due diligence processes for slavery and human trafficking	4
Responsibility for the policy	5
Reporting modern slavery within the Company or its suppliers	6
Indicators of Potential Modern Slavery	6
Safeguarding contact details:.....	6
Communication and awareness of this policy	6
Review.....	6
1. LearnTech's Vision and Mission	7
2. Scope of Policy	7
3. Responsibility for Policy	7
4. Compliance with the policy.....	7
5. Communication & Awareness of this policy	8
6. Breaches of this policy	8
7. External Reporting & Referrals Pathways.....	8
8. Interaction with other Workplace Policies and Procedure	9

Version Control

Version	Date	Editor	Comments
V1	03/02/2025	KF	Full policy review
V2	18.08.2026	LCB	Full Policy Review

Summary of Changes

Page number	Change
All	Updated throughout

Policy Review Schedule	This policy will be reviewed annually and sooner where legislative or organisational changes require.
Next Review Date	August 2027

Purpose

The LearnTech Policy on Modern Slavery is to be reviewed each year, in accordance with clause 6 of the Modern Slavery Act 2015; this Act requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

Statement & Policy

LearnTech is committed to the principles of the Modern Slavery Act 2015 and working towards the eradication of slavery and human trafficking. This policy acknowledges the legislation and laws implemented by the Modern Slavery Act 2015; and details the steps that the organisation is taking to work towards upholding the provision of the Act.

We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for all our staff and for them to feel confident they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Organisation Structure

LearnTech provides and supports education to a wide range of learners from age 16 to adult.

This includes working with external partners and supply chains

These include:

External partners	Suppliers
Business partnerships	Printing of promotional materials
Employers	Advertising, including digital and print
External contractors including advisors and consultants	Merchandise
Guest speakers and lecturers	

Due to the nature of our business, and the funding rules and legislation around our provisions, and the limited number of suppliers in our supply chain, with rigorous procurement processes, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Due diligence processes for slavery and human trafficking

LearnTech is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and expectation is communicated through supplier onboarding, due diligence and contractual arrangements.

LearnTech incorporates modern slavery considerations into its employer and supplier onboarding processes. As part of the onboarding and due diligence process, employers and relevant business partners are required to confirm their commitment to preventing modern slavery and human trafficking within their own organisation and supply chains. Where applicable, employers and suppliers will be asked to confirm whether they have a Modern Slavery Policy and/or Modern Slavery Statement in place, and this declaration will form part of LearnTech's risk assessment and approval process. Any concerns identified through onboarding or contract management activities may result in further due diligence, enhanced monitoring, or a decision not to enter into, or continue, a business relationship.

Suppliers assessed as medium or high risk through LearnTech's due diligence and risk assessment process must provide evidence of appropriate modern slavery controls, policies, statements, or other relevant assurances

before approval is granted. LearnTech reserves the right to undertake enhanced due diligence, request additional information, or decline to engage with suppliers where sufficient assurances cannot be provided.

All employees and persons employed or contracted to work within LearnTech are asked to familiarise themselves with this policy at the start of their employment or association and are contractually obligated to adhere to LearnTech's policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern-day slavery or human trafficking within our own organisation.

LearnTech has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

Whilst the organisation predominantly utilises UK-based suppliers, LearnTech recognises that modern slavery remains a risk within all sectors and jurisdictions. Therefore, all suppliers will be subject to appropriate due diligence and risk assessment regardless of location.

LearnTech also has a policy for the protection of "Whistle-blowers" to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.

The steps we will take to further the goals of the Modern Slavery Act 2015 are:

- Conducting risk assessments to determine which parts of LearnTech and its suppliers are most at risk of modern slavery so that efforts can be focussed on those areas.
- Engaging with our suppliers to convey to them LearnTech's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses.
- Implement proportionate supplier risk assessments and require medium and high-risk suppliers to provide evidence of modern slavery controls and compliance arrangements before approval.
- Introduce contractual provisions for our suppliers to confirm their adherence to LearnTech's policy.
- Publishing this policy on LearnTech's website to clearly display LearnTech's support to end modern slavery.

Responsibility for the policy

Ultimate responsibility for the prevention and detection of modern slavery within the company rests with LearnTech's Directors and senior leadership team. LearnTech's Directors have overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.

As part of the policy review, the Designated Safeguarding Lead (DSL) and Director for Safeguarding will undertake an annual review of LearnTech's approach to preventing modern slavery and human trafficking. This review will include:

- Modern slavery awareness and training completed during the reporting period.
- Any concerns, disclosures, or reports relating to modern slavery or human trafficking.
- Supplier, contractor, or partner risks identified through due diligence and risk assessment activities.

- Actions taken to address identified risks, including referrals, investigations, enhanced monitoring, or procurement decisions.
- Recommendations for continuous improvement and any required updates to policy, procedures, or training.

Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Reporting modern slavery within the Company or its suppliers

LearnTech's "Whistleblowing" and "Safeguarding" policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with LearnTech or its suppliers may be reported by employees in this manner. The aforementioned policies apply to employees and may be found in the V Drive, which all staff have access.

To surmise, any suspected instance of modern slavery or human trafficking within LearnTech or its suppliers must be reported to LearnTech's designated "Safeguarding Lead", who will investigate and advise the appropriate people of any further actions.

Indicators of Potential Modern Slavery

Examples:

- restricted freedom of movement
- withholding of identity documents
- unexplained control by third parties
- fearfulness or inability to speak independently
- signs of debt bondage
- poor living conditions

Safeguarding contact details:

Designated Safeguarding Lead:	Lucy Brighton
Governor for Safeguarding:	Katie Fowler
Safeguarding Email:	Safeguarding@learn-tech.com
Safeguarding Telephone:	0330 014 0270

Communication and awareness of this policy

This policy is displayed on LearnTech's website, and the Team LearnTech Intranet and the location is conveyed to all staff members at their induction.

Review

The Modern Slavery Policy will be reviewed annually by the Designated Safeguarding Lead, Director for Safeguarding and Directors. The review will consider training undertaken, concerns raised, supplier risks identified,

actions taken and recommendations for continuous improvement in accordance with clause 6 of the Modern Slavery Act 2015

1. LearnTech's Vision and Mission

- 1.1 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.
- 1.2 LearnTech operates a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.3 LearnTech is also committed to ensuring there is transparency in all its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all of LearnTech's contractors, suppliers, and other business partners. Wherever practicable, LearnTech will seek to include in its contracts with business partners specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that its suppliers will hold their own suppliers to the same high standards.

2. Scope of Policy

- 2.1 This policy applies to all persons working for LearnTech or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 2.2 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for Policy

- 3.1 LearnTech's Company Directors and Board have overall responsibility for ensuring that this policy complies with LearnTech's legal and ethical obligations, and that all those under its control comply with it.
- 3.2 LearnTech's Designated Safeguarding Lead along with the Safeguarding Governor, have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.4 LearnTech welcomes any comments on this policy and suggestions on ways in which it might be improved. These are encouraged and should be addressed to the Safeguarding Team.

4. Compliance with the policy

- 4.1 All staff must ensure that they read, understand, and comply with this policy.
- 4.2 The prevention, detection, and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for or under LearnTech's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 4.3 All staff must notify their manager, Team Deputy Designated Safeguarding Lead [DDSL] or Designated Safeguarding Lead [DSL], as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 4.4 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of LearnTech's business or supply chains at any level of supply at the earliest possible stage.
- 4.5 If a member of staff believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager, DDSL or DSL, or report it in accordance with LearnTech's "Whistleblowing" Policy as soon as possible.
- 4.6 If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of LearnTech's supply chain(s) constitutes any of the various forms of modern slavery, this must be raised with the respective line manager, DDSL or DSL.
- 4.7 LearnTech encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 4.8 LearnTech is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they must inform their Line Manager and/or Safeguarding Officer immediately. If the matter is not remedied, and they are an employee, it must be raised formally using LearnTech's 'Grievance Procedure' which can be found with the staff handbook and on the Team LearnTech staff intranet.

5. Communication & Awareness of this policy

- 5.1 Training on this policy, and any risk that LearnTech business faces, from modern slavery in its supply chains, will be provided as necessary. All employees will receive modern slavery awareness training as part of induction and periodic refresher training thereafter. Managers involved in recruitment, safeguarding, procurement and supplier management will receive enhanced training.
- 5.2 LearnTech's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter.

6. Breaches of this policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 LearnTech may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

7. External Reporting & Referrals Pathways

- 7.1 Where concerns regarding modern slavery, human trafficking, forced labour, servitude, or exploitation are identified, LearnTech will take appropriate action to safeguard individuals and fulfil its legal and ethical responsibilities.

- 7.2 Following an internal investigation and risk assessment, the Designated Safeguarding Lead (DSL) or appropriate senior manager may make referrals to external agencies where necessary. These may include;
- 7.2.1 The Police, where there is evidence of criminal activity, immediate risk of harm, or where a crime is suspected.
 - 7.2.2 The Modern Slavery and Exploitation Helpline, for advice, support, intelligence sharing, or reporting concerns relating to suspected modern slavery.
 - 7.2.3 Local Authority Safeguarding Teams, where there are concerns regarding the safety or welfare of children, young people, or vulnerable adults.
 - 7.2.4 The National Referral Mechanism (NRM), where an individual is identified as a potential victim of modern slavery and meets the criteria for referral.
 - 7.2.5 Any other relevant regulatory, enforcement, funding, or safeguarding bodies as deemed appropriate by the DSL or Senior Leadership Team.
- 7.3 Where concerns relate to a supplier, contractor, partner organisation, or another third party, LearnTech may also take appropriate contractual or procurement action, including suspension of contracts, enhanced due diligence, or termination of business relationships where serious breaches are identified.
- 7.4 All concerns will be handled sensitively, confidentially, and in accordance with LearnTech's Safeguarding, Whistleblowing, Data Protection, and related policies.

8. Interaction with other Workplace Policies and Procedure

- LearnTech's Safeguarding & Prevent Policy
- LearnTech's Employee Handbook
- LearnTech's Data Protection Policy
- LearnTech's Disciplinary, Grievance and Whistleblowing Policies