

# Modern Slavery & Human Trafficking Statement

<b>Family:</b>	HR
<b>Reference Code</b>	Q/1
<b>Line Manager Responsible:</b>	HR
<b>Approval Date:</b>	30 July 2023
<b>Issue Date:</b>	1 <sup>st</sup> August 2023
<b>Review Date:</b>	31 <sup>st</sup> July 2024



## POLICY STATEMENT

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 in order to exploit them for personal or commercial gain.

Free2Learn has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our activities and relationships and, to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own activities.

We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other partners, and as part of our contracting processes, we will include 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 our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, volunteers, contractors, external consultants, third-party representatives and partners.



## **Background**

The Modern Slavery Act 2015 required the organisation to make public the efforts made to develop transparent supply chains and recognise responsibilities in eradicating this crime.

As part of the safeguarding responsibilities, Free2Learn must recognise the potential impact of modern day slavery and human trafficking; report concerns and take action as required.

Free2Learn has a responsibility to be alert to the risks, however small, in its activities and in the wider supply chain.

## **The Current Duty**

Section 54 of the Modern Slavery Act 2015, requires commercial organisations with a total annual turnover of at least £36 million to prepare a slavery and human trafficking statement for each financial year. The statement must set out the steps that the organisation has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. There is no duty to take any such steps, only to publish a statement; an organisation can comply with the duty by publishing a statement confirming that it has not taken any steps.

Our policy statement is published on the website, with a link to it from the homepage.

## **Principal Risks**

The key risks to Free2Learn would be:

- Failure to fulfil statutory and moral responsibilities in the safeguarding of students which includes modern slavery, human trafficking and violation of human rights.
- Trading with a contractor or sub-contractor using slavery/forced labour including human trafficking or child labour and/or where workplace conditions such as working hours and health and safety are inadequate. This is an increased risk where the supply chain is multi-layered and/or in sourcing goods and services from parts of the developing world.
- Not having clear and well-communicated policies and procedures for concerns to be raised and addressed.
- Failure to train key staff, and raise awareness throughout the company.



As part of the initiative to identify and mitigate risk:

- Clear and accessible policies for procurement and safeguarding.
- Without compromising value for money, wherever possible Free2Learn builds professional relationships with local suppliers and always makes clear the expectations of business behaviour.
- With national or international supply chains the point contact should, wherever possible, be with a UK branch As part of any tender process Free2Learn will request the company's anti-slavery policy statement should they be in scope
- Systems to encourage the reporting of concerns and the protection of whistleblowers are in place. Concerns regarding the supply chain and/or procurement practices should be made to SLT. Safeguarding concerns should be made in accordance with our current policy.

### **Responsibility for the Policy**

Free2Learn has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The company has 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.

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.

Staff are invited to comment on this policy and suggest ways in which it might be improved. and should be addressed to a member of the Leadership Team.

### **Compliance with the policy**

All staff must read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all staff.

All staff must notify their line manager as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.



If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or report it in accordance with the Whistleblowing Policy as necessary as soon as possible.

Free2Learn will aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring 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 our own activities or in any of our supply chains.

Communication & Awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary investigation, which could result in a disciplinary penalty in accordance with our policy. Free2Learn may terminate relationships with other individuals and organisations working on our behalf if they breach this policy.