

Modern Slavery and Human Trafficking Policy

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Version No	3
Operational from	September 2025
Policy prepared by	Nick Preston
Policy Approved by	Judith Allen – CEO
Whistleblowing Contact	Nick Preston – npreston@education-wise.org – 0117 379 0450
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Purpose

Educationwise is committed to acting with integrity and transparency in all operations. We take a **zero-tolerance** approach to modern slavery and human trafficking and are committed to ensuring there is no modern slavery in our organisation or supply chains. Educationwise will meet its obligations under the **Modern Slavery Act 2015**, including publishing an annual modern slavery statement **where legally required** and setting out the steps taken to prevent slavery and human trafficking.

Scope

This policy applies to all **staff, workers, contractors, learners, volunteers, subcontractors, suppliers, and third-party agents** acting on behalf of Educationwise. It also sets expectations for our **suppliers and business partners**.

Definition

Modern slavery includes **slavery, servitude, forced or compulsory labour, and human trafficking**. These are grave human rights violations and will be challenged at every level of our activity.

Our Commitments

- **Compliance with UK employment law:** Including pay, working time, benefits, and fair terms.
- **Safer recruitment and right-to-work:** Robust pre-employment checks, identity and right-to-work verification, and (where applicable) enhanced checks for roles working with children and vulnerable adults.
- **Fair treatment and safe work:** A safe, healthy, and respectful environment for staff and learners.
- **Freedom of association:** Respect for lawful association and collective bargaining.
- **Clear reporting routes:** Accessible, confidential channels for concerns, including via safeguarding and whistleblowing.

Supply Chain and Subcontractor Expectations

- **Contractual standards:** Anti-slavery and human-rights clauses in relevant contracts and subcontract agreements.
- **Due diligence (risk-based):** Proportionate checks on new and existing suppliers/subcontractors, focusing on higher-risk categories (e.g., facilities, cleaning, temporary labour, overseas goods).
- **Annual confirmation:** Where appropriate, obtain supplier confirmations (or statements) that they comply with the Modern Slavery Act and maintain suitable policies/training.
- **Remedy and escalation:** Where concerns arise, we will seek corrective action plans. Educationwise may **suspend or terminate** relationships where risks are not adequately addressed.

Risk Assessment and Mitigation

- **Periodic risk assessments** of our operations and supply chain to identify higher-risk areas.
- **Targeted controls** (enhanced checks, audits, or contract addenda) for higher-risk suppliers/partners.
- **Ongoing monitoring** through contract management, quality reviews, and issue tracking.
- **Annual statement (where required):** Outlining risks, actions taken, due diligence, training, and effectiveness measures.

Roles and Responsibilities

- **CEO and Senior Leadership Team (SLT):** Overall accountability for compliance and resourcing.
- **Designated Safeguarding Lead (DSL) / Whistleblowing Contact:** Receive and coordinate responses to concerns; liaise with HR/Compliance.
- **Managers:** Ensure teams understand this policy; apply due diligence in procurement and subcontracting; escalate concerns.
- **All staff and contractors:** Act ethically, complete training, remain vigilant to indicators of exploitation, and **report concerns immediately**.

Training and Awareness

- **Mandatory induction** for staff covering modern slavery awareness, indicators, and reporting routes.
- **Enhanced training** for higher-risk roles (recruitment, procurement, subcontract management).
- Periodic **refreshers** and updated guidance where risks or legislation change.

Reporting and Whistleblowing

- **Report immediately** to: Nick Preston (Whistleblowing Contact) – npreston@education-wise.org – 0117 379 0450, or **HR** at hr@education-wise.org.
- Concerns may also be raised via the **Safeguarding** route where there is risk of harm or exploitation.
- Reports will be treated **confidentially** and investigated promptly. Anyone raising concerns in **good faith will not face retaliation**.

Responding to Concerns

- **Triage and investigation:** Assess risk to any person, take protective steps as needed, gather evidence, and interview relevant parties.
- **Actions and remedy:** Require corrective action, suspend activity, notify relevant authorities, and support affected individuals as appropriate.
- **External reporting:** Where required, Educationwise will notify law enforcement or other appropriate agencies and, if relevant, inform customers/partners.

Record-Keeping and Assurance

- Maintain records of risk assessments, due diligence, investigations, actions, supplier confirmations, and training completion.
- Retain records for a **minimum of six years** (or longer where legally required).
- SLT will receive **annual assurance reporting** and oversee continuous improvement.

Monitoring and Review

- This policy will be **reviewed annually** or sooner if legislation or organisational risk changes.
- Progress against commitments (including due diligence and training coverage) will be reviewed by SLT and reported to the Board.
- Where legally required, the **annual modern slavery statement** will be approved by the Board and published.

Contact for Reporting Concerns

- **Whistleblowing Contact:** Nick Preston – npreston@education-wise.org – 0117 379 0450
- **HR:** hr@education-wise.org