

Modern Slavery Policy

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes four different forms. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain:

- 1) **Slavery** - Exercising powers of ownership over a person
- 2) **Servitude** - The obligation to provide services imposed by the use of coercion
- 3) **Forced and Compulsory Labour** - Work or services exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
- 4) **Human trafficking** - Arranging or facilitating the travel of another person with a view to their exploitation

We are committed to ensuring that we act ethically and with integrity in all of our business dealings, including in our relationships and work with colleagues, customers, suppliers and business partners.

Relevant Legislation & Related Policies

Our approach to eradicating modern slavery is compliant with the following legislation:

- Modern Slavery Act 2015

It is further supported by the following Estio policies and procedures:

- Colleague screening procedures
- Safeguarding Policy
- Whistle-blowing Policy
- Bullying & Harassment Policy
- Disciplinary Policy
- Grievance Policy
- Employer engagement and learner recruitment processes

Responsibilities

This policy applies to all colleagues, customers, suppliers and business partners.

Process

- Check that all colleagues working on our behalf have the right to live and work in the UK by reviewing original passports, visas and other identification evidence.
- Adhere to legislation and funding rules relating to age requirements, the school leaving date, wages and working time regulations.
- Inform employers of planned changes to the national minimum wage and/or any changes to the rules covering apprenticeship pay, to ensure that all apprentices are paid appropriately and at least the minimum wage set by government, and are free to leave their employment.
- Provide training on this policy to all sales and recruiting managers and to publish the policy so that all colleagues can access it via the intranet.

- Cover topics relating to modern slavery and human trafficking as part of our apprenticeship delivery, in order to raise awareness with apprentices as both employees and employers.
- Protect whistle-blowers and report any unethical conduct.
- Participate in audits conducted by internal and external auditors and respond appropriately to any findings or recommendations. We will take steps to improve any suppliers' practices, including providing advice and requiring them to implement actions plans.

Monitoring and review

Review Date: October 2019

Next Review Date: October 2020

Policy Owner: Quality and Client Relations Director/ HR Director