

## Modern Slavery Policy

### Policy Context

This policy outlines LAAT's commitment to combatting modern slavery and human trafficking in all its forms. This policy reflects legal requirements and ethical principles aimed at preventing exploitation, protecting vulnerable individuals, and holding perpetrators accountable. It typically includes measures such as due diligence in supply chains, employee training and awareness-raising, reporting mechanisms for suspected cases of modern slavery, and collaboration with relevant stakeholders, including law enforcement agencies and civil society organisations. This policy seeks to uphold human rights, demonstrate corporate responsibility, and contribute to the eradication of modern slavery within their operations and broader supply chains.

London Academy for Applied Technology (LAAT) is a training and education specialist working with further education providers, employers, and learners to help them achieve success.

The Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and training, etc. to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

Modern slavery is defined as the recruitment, movement, harbouring or receiving of people using force, coercion, abuse or vulnerability, deception, or other means for the purpose of exploitation.

Human trafficking involves the recruitment or movement of people for exploitation using threat, force, fraud, or the abuse of vulnerability.

Further information is available at [www.legislation.gov.uk](http://www.legislation.gov.uk) (Modern Slavery Act 2015).

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

LAAT has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. LAAT is also committed to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

LAAT also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will, in turn, hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, LAAT accepts that it has a responsibility through its due

diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. LAAT is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Whistleblowing Policy - LAAT encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for everyone to make disclosures, without fear of retaliation.

Employee Code of Conduct - This sets out expectations and principles for what LAAT considers to be appropriate workplace behaviour.

We are committed to ensuring that our employees, employers, apprentices/learners, and others adhere to the highest standards of ethics. It is a requirement to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with our employers to ensure that they meet the highest standards of ethics and improve their worker's working conditions. However, serious violations of these standards will lead to the termination of the business relationship.

LAAT will use only reputable employers and always verifies the practices of any new companies it is using before accepting any apprentice/learners.

## **Recruitment**

All employees are to bring with them documentary evidence of their right to work in the UK and their identity. Evidence should be as prescribed by UK Visas and Immigration and the Disclosure and Barring Service and can include a current driving licence or passport including a photograph, or a full birth certificate, and a document such as a utility bill or financial statement that shows the employees' current name and address (please note that these latter two are time-limited and must be no more than 3 months old). Where appropriate, evidence should also include change of name documentation. Some form of photographic ID must be seen.

An offer of appointment to any successful employee is conditional upon:

- Receipt of written references, covering the last 5 years of employment, confirmed by telephone where possible.
- Verification of the candidate's identity
- A basic, standard, or enhanced Disclosure and Barring Service check, depending on role, which includes a check of the Barred Lists, including an overseas 'Certificate of Good Conduct' or equivalent.
- Evidence of permission to work for those who are not nationals of a European Economic Area country.

- Verification of the candidate's medical fitness through a health questionnaire
- Verification of qualifications

All checks will be:

- Confirmed in writing.
- Documented and retained on the personnel file (subject to restrictions on the retention of information imposed by Disclosure and Barring Service regulations)
- Followed up where they are unsatisfactory or where there are discrepancies in the information provided.

LAAT will not support or deal with any business knowingly involved in slavery or human trafficking.

Additional procedures ensure that this statement is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Company activities.

## Definitions

The organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

## Aims

### **Training**

To ensure all staff understand the risks of modern slavery and human trafficking, LAAT will continue to develop awareness training as part of the essential training programme. Awareness of the risks will also be raised with employers and apprentices/learners regularly throughout their time on program.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have appropriate staff training. This provides our employees with knowledge on how to identify exploitation and modern slavery as well as the process for reporting suspected cases.

During the induction process and throughout employment, training is provided to staff on topics relating to modern slavery.

### **Breach of Policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. LAAT may terminate its commercial relationship with suppliers, contractors and

other business partners if they breach this policy and/or are found to have been involved in modern slavery.

UK Modern Slavery Adult Victim support providers

England and Wales

The Salvation Army 0300 303 8151

Modern Slavery Helpline

The NGO Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers, and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

Further information

UK Government Modern Slavery Webpage

[www.gov.uk/government/collections/modern-slavery](http://www.gov.uk/government/collections/modern-slavery)

Modern Slavery Act 2015

[www.legislation.gov.uk/ukpga/2015/30/contents/enacted](http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted)

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015

[www.legislation.gov.uk/ukdsi/2015/9780111138847](http://www.legislation.gov.uk/ukdsi/2015/9780111138847)

Transparency in Supply Chains Consultation Document and Government Response

[www.gov.uk/government/consultations/modern-slavery-and-supply-chains](http://www.gov.uk/government/consultations/modern-slavery-and-supply-chains)

Anti-Slavery Commissioner


[www.antislaverycommissioner.co.uk/](http://www.antislaverycommissioner.co.uk/)

Alliance 8.7

[www.alliance87.org/](http://www.alliance87.org/)

This policy should be read in conjunction with:

- Safeguarding Policy
- Prevent and British Values Policy
- Equality, Diversity & Inclusion Policy
- Safer Recruitment Policy
- Grievance Policy
- Whistleblowing Policy

<b>Signed</b>	
<b>Title</b>	Director of LAAT
<b>Date of policy</b>	02/01/2024