Modern Slavery and Human Trafficking Policy

1.Our Commitment

Let's Educate Limited is committed to conducting its business ethically, responsibly and with respect for human rights.

We have a zero-tolerance approach to modern slavery, human trafficking, forced or compulsory labour, servitude, debt bondage, child labour, child exploitation and all other forms of exploitation within our own operations, our supply chain and the services delivered on our behalf.

We recognise the particular responsibility that comes with working with children, young people, vulnerable learners, education professionals, schools, local authorities and other public-sector organisations.

Modern slavery can be hidden and may occur in organisations, labour supply arrangements and supply chains of any size. We will therefore take reasonable, proportionate and risk-based steps to identify, prevent, mitigate and respond to modern slavery risks rather than assuming that an absence of reported cases means an absence of risk.

Everyone working for, through or on behalf of Let's Educate Limited is expected to uphold this commitment.

2.Purpose

The purpose of this policy is to:

- establish Let's Educate Limited's approach to preventing modern slavery and human trafficking
- identify and assess modern slavery risks within our business and supply chain
- establish appropriate due diligence, recruitment and supplier controls
- protect workers, tutors, children, young people and vulnerable individuals from exploitation
- enable staff, tutors and contractors to recognise potential indicators of exploitation
- establish clear reporting and escalation procedures
- ensure concerns are responded to promptly, sensitively and appropriately
- set clear expectations for suppliers, subcontractors and business partners
- monitor the effectiveness of our controls and drive continuous improvement
- demonstrate our commitment to responsible and ethical procurement and contract delivery.

3.Legal and Regulatory Framework

This policy has been developed regarding applicable UK legislation and guidance, including:

- the Modern Slavery Act 2015
- the Employment Agencies Act 1973 and applicable Conduct Regulations
- the Immigration, Asylum and Nationality Act 2006 and associated right-to-work requirements
- applicable safeguarding legislation and statutory guidance
- the Procurement Act 2023 and associated public procurement requirements where relevant
- current Home Office guidance on transparency in supply chains
- applicable Government guidance on tackling modern slavery within public-sector supply chains.

Section 54 of the Modern Slavery Act 2015 requires qualifying commercial organisations to publish an annual slavery and human trafficking statement.

Where Let's Educate Limited meets the statutory criteria, it will comply fully with the applicable requirements.

Where the statutory reporting threshold does not apply, the Company remains committed to applying the principles of transparency, due diligence and continuous improvement reflected within the legislation and associated guidance.

We recognise that contracting authorities and clients may require evidence of modern slavery controls regardless of organisational turnover or whether a statutory reporting obligation applies.

Let's Educate Limited will cooperate transparently with reasonable modern slavery requirements forming part of procurement, framework, tender and contract management processes.

4. Scope

This policy applies to all individuals and organisations working for, through, with or on behalf of Let's Educate Limited where relevant, including:

- directors
- employees
- recruitment and compliance staff
- tutors
- teachers and education professionals
- temporary workers
- self-employed contractors
- consultants
- subcontractors
- recruitment partners
- referral partners
- payroll and umbrella providers
- vetting and screening providers
- suppliers
- professional advisers
- technology and service providers
- other business partners.

All individuals covered by this policy are expected to act ethically, comply with applicable legislation and report concerns promptly.

We also expect our suppliers and business partners to maintain appropriate standards for preventing modern slavery and exploitation within their own operations and supply chains.

Our Business and Supply Chain

5. Organisational Context

Let's Educate Limited is an alternative provision and provides specialist education, tuition and related services to organisations including schools, local authorities, education settings and other commissioning bodies.

The nature of our work means that the nature of our activities involves the recruitment, vetting, engagement and deployment of education professionals and tutors to support children and young people.

Our wider supply chain may include:

- tutors and education professionals
- recruitment and candidate sourcing platforms
- job boards
- payroll and umbrella providers
- DBS and background screening providers
- safeguarding and training providers
- IT and software suppliers
- telecommunications providers
- professional services
- office and equipment suppliers
- subcontractors
- consultants
- other education and specialist service providers.

Although most of our activities are service based, we recognise that modern slavery risks can occur throughout direct and indirect supply chains.

Risk Assessment and Management

6. Our Approach to Risk

Let's Educate Limited adopt a risk-based approach to identifying and managing modern slavery.

Risk assessment may consider factors including:

- the type of worker or service being supplied
- use of recruitment intermediaries
- subcontracting arrangements
- complexity of the supply chain
- geographical location
- reliance on migrant or temporary labour
- recruitment practices
- payment arrangements
- use of umbrella or payroll providers
- the vulnerability of individuals involved
- sector-specific risks
- information received through complaints, safeguarding reports or whistleblowing
- previous concerns or adverse findings

- information provided by contracting authorities or other credible sources.

Modern slavery risk is considered alongside our wider safeguarding, recruitment, compliance and supplier management responsibilities.

Risk assessments will be reviewed where circumstances change, or new information suggests that a relationship may present an increased risk.

7. Key Areas of Potential Risk

Potential areas of risk relevant to our activities include:

- workers recruited through misleading or coercive arrangements
- workers being charged inappropriate recruitment fees
- debt bondage associated with obtaining employment
- unlawful or excessive deductions from wages
- wages being controlled or redirected to another individual
- third parties exercising inappropriate control over a worker
- retention of passports or identity documents
- unclear employment or engagement arrangements
- excessive or coercive working arrangements
- workers being unable to leave employment or an assignment freely
- exploitation of migrant or temporary workers
- undisclosed subcontracting or labour supply
- unethical practices within payroll or umbrella arrangements
- exploitation within outsourced services
- suppliers with insufficient controls over their own supply chains
- safeguarding concerns involving children or vulnerable people
- criminal or sexual exploitation of children and young people.

Where a higher level of risk is identified, enhanced due diligence, monitoring or other mitigating measures may be applied.

Responsible Recruitment

8. Recruitment and Engagement Standards

Let’s Educate Limited is committed to fair, transparent and responsible recruitment.

Our recruitment and compliance procedures are designed to help ensure that individuals are who they say they are, are legally entitled to work where required and understand the nature of their engagement.

Appropriate controls include:

- identity verification
- right-to-work verification
- relevant safer recruitment checks

- DBS and safeguarding checks where applicable
- qualification and professional registration checks where required
- employment history and reference checks
- clear contractual or engagement documentation
- transparent information regarding remuneration
- clear information regarding assignments and working arrangements
- use of reputable recruitment and sourcing channels
- appropriate oversight of payroll and umbrella arrangements
- accessible routes for raising concerns.

No individual will knowingly be engaged by Let's Educate Limited where we believe they are subject to forced labour, trafficking or exploitation.

9. Recruitment Fees and Worker Freedom

Let's Educate Limited will not charge work seekers a fee for finding them work where prohibited by law.

We will not knowingly participate in or facilitate recruitment arrangements that place workers into debt bondage or restrict their freedom through inappropriate recruitment charges.

We expect organisations involved in recruitment or labour supply on our behalf to adopt the same approach.

Individuals should retain control of their own passport and identity documentation. Original documents may be inspected as part of lawful identity, vetting or right-to-work checks but should not be retained as a means of controlling an individual or preventing them from leaving employment.

Workers must be free to terminate their engagement subject to lawful and transparent contractual arrangements.

Supply Chain and Due Diligence

10. Supplier Standards

Let's Educate Limited seeks to work with reputable, responsible suppliers and partners who share our commitment to ethical conduct and human rights.

Suppliers and subcontractors are expected to:

- comply with applicable modern slavery and human trafficking legislation
- comply with applicable employment and worker-protection legislation
- prohibit forced, compulsory and trafficked labour
- prohibit child labour and exploitation
- maintain fair and transparent recruitment practices
- not unlawfully retain identity documents
- not facilitate debt bondage
- provide workers with appropriate information regarding their employment or engagement
- maintain appropriate routes for reporting concerns

- cooperate with reasonable enquiries relating to modern slavery risk
- take prompt corrective action where a concern is identified.

Where appropriate, these expectations may be incorporated into supplier terms, contracts or other contractual documentation.

11. Supplier Due Diligence

Due diligence will be proportionate to the nature and level of risk presented by the supplier or service.

Depending on the circumstances, our due diligence may include:

- verifying the identity and legitimacy of the organisation
- reviewing relevant modern slavery policies or statements
- reviewing employment and recruitment practices
- reviewing safeguarding arrangements
- reviewing relevant accreditations, certifications or memberships
- examining subcontracting arrangements
- understanding how workers are recruited and paid
- assessing the use of umbrella, payroll or labour supply providers
- requesting evidence of compliance with applicable legislation
- requesting information about relevant supply chain risks
- carrying out further enquiries where concerns arise
- requiring corrective action
- conducting periodic supplier reviews.

Where a supplier operates in a higher-risk area or activity, the level of scrutiny may be increased.

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12. Subcontracting

Subcontracting must not be used as a means of avoiding the requirements of this policy.

Where services are subcontracted, we expect relevant modern slavery and ethical employment standards to be communicated through the supply chain.

Where appropriate and proportionate, we may require subcontractors to:

- meet standards equivalent to those contained within this policy
- undertake appropriate due diligence within their own supply chains
- provide information requested as part of a modern slavery assessment
- notify us of material modern slavery concerns
- cooperate with investigations, remediation and monitoring.

Undisclosed or unauthorised subcontracting may result in contractual review or other appropriate action.

Public Procurement and Contract Delivery

13. Tender and Procurement Commitments

Let's Educate Limited recognises that public sector clients may assess modern slavery risk throughout procurement and contract delivery.

Where relevant to a tender, framework or contract, we will:

- provide accurate and transparent information regarding our modern slavery arrangements
- respond appropriately to procurement specific modern slavery questions
- provide relevant policies, procedures and supporting evidence
- cooperate with proportionate due diligence undertaken by a contracting authority
- disclose our approach to identifying and managing relevant supply chain risks
- explain our approach to responsible recruitment
- demonstrate how concerns can be reported and escalated
- provide evidence of relevant training where requested
- maintain appropriate records to demonstrate compliance
- cooperate with reasonable contract monitoring requirements.

Where requested and proportionate, Let's Educate Limited will complete a Modern Slavery Assessment Tool or equivalent assessment and will respond constructively to any recommendations or improvement actions arising from that assessment.

We will not knowingly provide inaccurate or misleading information in relation to modern slavery during a procurement process.

13. Contract Delivery

Where modern slavery requirements form part of a contract, relevant responsibilities will be incorporated into contract mobilisation and ongoing contract management.

This may include:

- communicating applicable requirements to relevant employees and tutors
- identifying any contract-specific modern slavery risks
- reviewing relevant subcontractors or suppliers
- maintaining appropriate evidence of recruitment and due diligence
- monitoring identified risks
- recording concerns and corrective actions
- reporting information to the contracting authority where contractually required and lawful
- supporting audits or assurance activity
- reviewing lessons learned during contract delivery.

Modern slavery risk will not be treated solely as a precontract tender requirement. Where relevant it will remain under review throughout the life of the contract.

Public Procurement and Contract Delivery

15. Children, Young People and Vulnerable Individuals

Safeguarding is fundamental to Let's Educate Limited's work.

Children and young people can be particularly vulnerable to trafficking and exploitation, including:

- criminal exploitation
- sexual exploitation
- forced labour
- forced criminality
- trafficking
- domestic servitude
- exploitation connected with county lines or organised criminal activity.

Any concern that a child or vulnerable individual may be experiencing modern slavery or exploitation must be treated as a safeguarding concern.

Our safeguarding procedures take priority where there is a concern regarding the immediate welfare or safety of a child.

Employees and tutors must:

- report concerns promptly through the designated safeguarding route
- make appropriate factual records
- not attempt to investigate suspected exploitation themselves
- not confront a suspected perpetrator where doing so may increase risk

- not promise absolute confidentiality
- follow instructions from the Designated Safeguarding Lead or relevant statutory body
- take immediate action where a child is believed to be at immediate risk of harm.

Appropriate referrals may be made to Children's Social Care, the police or other statutory or safeguarding bodies.

Recognising Modern Slavery

16. Potential Indicators

Modern slavery may be difficult to identify. No single indicator necessarily proves that exploitation is occurring.

Potential indicators may include an individual who:

- appears frightened, anxious, withdrawn or unusually submissive
- appears to be controlled by another person
- is reluctant or unable to speak independently
- has answers provided on their behalf
- provides explanations that appear rehearsed or inconsistent
- does not control their own passport or identity documentation
- has little or no control over their wages or bank account
- reports unexplained deductions from pay
- has paid significant fees to secure work
- appears to be working to repay a debt
- is transported or accommodated in concerning circumstances
- appears unable to leave employment or accommodation freely
- is threatened with violence, dismissal, deportation or other consequences
- works excessive hours without appropriate rest
- has an unclear understanding of their pay or working arrangements
- displays signs of abuse, neglect, malnutrition or deprivation
- appears fearful of authorities.

Staff and tutors are not responsible for determining whether modern slavery has occurred.

Their responsibility is to recognise potential concerns and report them promptly.

Reporting and Whistleblowing

17. Raising a Concern

Anyone who suspects modern slavery, trafficking, forced labour or exploitation in connection with Let's Educate Limited should raise the concern as soon as possible.

A concern may relate to:

- an employee
- tutor
- candidate
- Worker
- student
- contractor
- subcontractor
- supplier
- payroll or umbrella provider
- client
- business partner
- any other person connected to our activities.

Concerns should be reported to:

Designated contact: Shanie Thomas | Divisional Manager
Email: Shanie.thomas@letseducate.co.uk

Where the concern relates to a child or young person, the Company's safeguarding reporting procedure must also be followed immediately.

Where the concern relates to the designated contact, it should be escalated to another Director or appropriate senior manager.

Where there is an immediate risk to life or safety, emergency services should be contacted without delay.

18. Confidentiality and Protection form Retaliation

Let's Educate Limited encourages individuals to speak up where something does not appear right.

Concerns will be treated seriously, sensitively and, so far as reasonably possible, confidentially.

No employee, tutor or contractor will suffer detrimental treatment for raising a genuine concern in good faith.

Victimisation, intimidation or retaliation against an individual who raises concern will not be tolerated.

Employees may also raise concerns in accordance with the Company's Whistleblowing Policy.

Responding to and Incident

19. Our Response

Where a potential modern slavery concern is identified, Let's Educate Limited will respond promptly and proportionately.

The safety and welfare of the potential victim will be the primary consideration.

Our response may include:

1. assessing whether anyone is at immediate risk of harm

2. taking appropriate safeguarding action
3. escalating the matter internally
4. preserving relevant records or information
5. seeking appropriate specialist or legal advice
6. referring the matter to an appropriate statutory authority
7. cooperating with law enforcement or safeguarding bodies
8. reviewing relevant recruitment or payment arrangements
9. reviewing the supplier, contractor or subcontractor concerned
10. implementing corrective actions
11. considering whether similar risks exist elsewhere within the business or supply chain
12. monitoring the effectiveness of remedial action.

Employees, tutors and contractors must not carry out an independent investigation.

20. Remediation and Victim Centred Response

Let's Educate Limited recognises that the way an organisation responds to exploitation can have a significant impact on the person affected.

Where exploitation is identified, we will seek to take a victim centered approach and avoid actions which could unintentionally place an affected individual at greater risk.

Depending on the circumstances, remediation may include:

- supporting appropriate referrals to statutory or specialist services
- correcting inappropriate payment or employment arrangements
- addressing unlawful or inappropriate deductions
- requiring a supplier to implement a corrective action plan
- requiring inappropriate recruitment fees to be addressed where relevant
- strengthening recruitment or supply chain controls
- increased monitoring
- additional training
- suspension of activity
- contractual sanctions
- termination of a supplier or subcontractor relationship where appropriate.

Termination will not automatically be considered the first or only response were doing so could cause further harm to affected workers.

Serious, deliberate or repeated breaches may result in termination and referral to appropriate authorities.

Prohibited Conduct

21. Zero Tolerance Requirements

No person working for or on behalf of Let's Educate Limited may:

- use forced or compulsory labour

- use trafficked labour
- employ or exploit child labour
- threaten or intimidate an individual into working
- knowingly benefit from exploitation
- unlawfully withhold wages
- unlawfully retain identity documents
- impose coercive recruitment arrangements
- facilitate debt bondage
- deliberately conceal modern slavery concerns
- knowingly ignore credible evidence of exploitation
- retaliate against an individual who raises a genuine concern
- knowingly allow a subcontractor to engage in prohibited practices.

Breaches may result in disciplinary action, termination of an assignment or contract, removal from our supply chain and/or referral to the appropriate authorities.

Training and Awareness

22. Training

Appropriate modern slavery awareness will be provided according to role and level of risk.

Relevant employees may receive training or guidance covering:

- the meaning and forms of modern slavery
- indicators of exploitation
- ethical and responsible recruitment
- recruitment fees and debt bondage
- right-to-work and identity considerations
- modern slavery risks within labour supply
- safeguarding links
- supplier and subcontractor risk
- reporting procedures
- responding appropriately to a disclosure
- victim-centred remediation
- responsibilities within procurement and contract delivery.

Employees with responsibility for recruitment, compliance, safeguarding, supplier management or contract management may receive more detailed guidance appropriate to their responsibilities.

Modern slavery awareness may form part of induction, safeguarding training, compliance training and refresher training.

Monitoring and Effectiveness

23. Key performance Indicators

Let’s Educate Limited will monitor the effectiveness of its approach using proportionate indicators.

These may include:

- 100% completion of required right to work checks before relevant individuals commence work
- 100% completion of required safer recruitment and safeguarding checks before relevant education professionals are cleared for work
- 100% completion of mandatory modern slavery awareness or associated compliance training by employees required to undertake it
- completion of proportionate due diligence for suppliers assessed as presenting a higher modern slavery risk
- number and nature of modern slavery concerns reported
- time taken to escalate significant concerns
- corrective actions identified and completed
- supplier concerns or non-conformities identified
- completion of relevant supplier or subcontractor reviews
- lessons identified from incidents, complaints, audits or safeguarding cases
- updates required following changes in legislation, guidance or procurement requirements.

Targets and monitoring arrangements may be developed further as the Company's activities and supply chain evolve.

An absence of reported incidents will not automatically be treated as evidence that modern slavery risk does not exist.

24. Audit and Assurance

Let's Educate Limited will maintain proportionate records to demonstrate implementation of this policy.

Where appropriate, assurance activity may include:

- internal file audits
- recruitment and compliance audits
- supplier reviews
- spot checks
- contractual compliance checks
- reviews of complaints and whistleblowing concerns
- safeguarding audits
- review of training records
- corrective-action monitoring.

Where required under contract, we will cooperate with reasonable audit and assurance requests from the contracting authority, subject to applicable confidentiality, safeguarding and data protection requirements.

Governance and Accountability

25. Board and Senior Management Responsibility

Overall responsibility for this policy rests with the Directors of Let's Educate Limited.

The Board and senior management are responsible for:

- promoting a culture in which exploitation is not tolerated
- ensuring appropriate governance arrangements are maintained
- ensuring relevant risks are considered
- supporting effective recruitment and safeguarding controls
- ensuring serious concerns receive appropriate oversight
- reviewing significant findings and corrective actions
- approving this policy and material revisions.

Modern slavery is recognised as an organisational responsibility rather than solely a responsibility for recruitment or compliance teams.

26. Responsibilities of Employees, Tutors and Contractors

Everyone working for or on behalf of Let's Educate Limited must:

- comply with this policy
- act ethically
- remain alert to possible indicators of exploitation
- complete required training
- report concerns promptly
- cooperate with legitimate investigations and assurance activity
- support safeguarding procedures
- treat individuals with dignity and respect.

Managers are responsible for ensuring that concerns raised with them are escalated appropriately.

Continuous improvement

27. Review of Risks and Controls

Modern slavery risks evolve over time.

Let's Educate Limited will therefore periodically review:

- its recruitment processes
- its supply chain
- supplier and subcontractor arrangements
- payroll and umbrella arrangements
- safeguarding risks
- reported concerns

- emerging legislation and guidance
- client and contracting-authority requirements
- lessons arising from audits or incidents.

Where opportunities for improvement are identified, proportionate improvements will be implemented.

28. Contract specific Improvement Plans

Where a contracting authority identifies a reasonable improvement relating to modern slavery risk, Let's Educate Limited will engage constructively with that authority.

Where appropriate, we will agree and implement an improvement or risk mitigation plan setting out:

- the issue identified
- actions required
- responsible individuals
- target completion dates
- evidence of completion
- review arrangements.

This approach supports transparent partnership working and continuous improvement throughout the life of a contract.

Transparency

29. Modern Slavery Statement

Where legally required, Let's Educate Limited will prepare, approve and publish an annual modern slavery statement in accordance with Section 54 of the Modern Slavery Act 2015.

Where the statutory requirement does not apply, the Company may nevertheless publish a voluntary statement or equivalent information to demonstrate its commitment to transparency and responsible business practices.

Any published annual statement should, where appropriate, address:

1. organisational structure, business and supply chains
2. modern slavery policies
3. risk assessment and management
4. due diligence and remediation
5. training and capacity building
6. monitoring, evaluation and effectiveness.

The Company will seek to demonstrate improvement over time rather than simply repeat the same statement from year to year.

30. Related Policies and Procedures

This policy should be read alongside other relevant Let's Educate Limited policies and procedures, including:

- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Code of Conduct
- Equality, Diversity and Inclusion Policy
- Anti-Bribery and Corruption Policy
- Complaints Policy
- Data Protection Policy
- Privacy Policies
- Employment Handbook
- relevant supplier and contractor terms.

Where a concern involves the welfare of a child or vulnerable individual, safeguarding procedures take priority.

31. Policy Review

This policy will be formally reviewed at least annually and sooner where appropriate following:

- changes in legislation or statutory guidance
- changes in public procurement requirements
- a material change to our business or supply chain
- entry into a contract presenting increased risk
- identification of a new or emerging modern slavery risk
- a significant safeguarding or modern slavery concern
- audit findings
- lessons learned following an incident
- material changes to recruitment, payroll or subcontracting arrangements.

The review will consider both whether the policy remains appropriate and whether the controls described within it are operating effectively.

32. Out Commitment

Let's Educate Limited believes that ethical recruitment, safeguarding, transparency and responsible supply chain management are fundamental to providing high-quality education services.

We recognise that modern slavery is often hidden and that effective prevention requires more than a written policy.

It requires:

- vigilance
- responsible recruitment
- effective safeguarding
- robust compliance
- appropriate due diligence
- responsible for supplier relationships
- open reporting
- strong governance
- measurable oversight
- willingness to act when concerns arise.

We are committed to working collaboratively with our employees, tutors, clients, contracting authorities, suppliers and partners to identify and reduce the risk of exploitation and to ensure that modern slavery and human trafficking have no place within our organisation or the services we deliver.

33. Version Control

- Version 1.0 - May 2026 - Initial Policy