



Safeguarding our Students

Modern Slavery Policy



Overview

Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery'. This is criminal activity that deprives victims of their liberty and usually involves financial or other exploitation.

We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains.

You must read and comply with this policy if you work for, or on behalf of us in any capacity including as an employee, director, officer, worker, consultant, volunteer, supplier or service provider. Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you. If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

Our Anti-Slavery Policy is managed by our Designated Safeguarding Lead (DSL), Katy McDonald. She is responsible for this policy along with our Compliance Officer, Linda Simi.

What is Modern Slavery?

The term Modern Slavery captures a whole range of types of exploitation, many of which occur together. These include:

Criminal exploitation

This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker.

Domestic servitude

This involves a victim being forced to work in predominantly private households, usually performing domestic chores and childcare duties. Their freedom may be restricted and they may work long hours often for little or no pay

Forced labour

Victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. It can happen in various industries. Often victims are housed together in one dwelling.

Sexual exploitation

This includes but is not limited to sexual exploitation and sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.



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Preventing Modern Slavery

We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.

We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

If you are an employee or a worker providing services for us

You must immediately report any suspicions of Modern Slavery in our business or supply chains to our DSL. Our DSL will investigate and report to our Director on actions to be taken. Any actions identified will be taken promptly to ensure concerns are resolved effectively.

You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our DSL and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

If you are one of our suppliers

If you supply us with goods or services, you must assess your business and supply chains and confirm to us that you:

- Comply with your legal obligations, in relation to Modern Slavery
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

If you breach this policy, or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

If you have any queries about any aspect of this policy, you should direct them in the first instance to Katy McDonald by email: katy.mcdonald@york-associates.co.uk or telephone: + 44 (0) 1904 624 246.

This document is available in large print or as an audio file if required.