

# **Transform Career UK Ltd**

## **Modern Slavery Policy**

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Policy Owner(s)	Transform Career UK Ltd
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# Modern Slavery Statement and Policy

This statement is made on behalf of Transform Career UK Ltd and its subsidiary companies with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy is to be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

## Company policy and statement

Transform Career UK Ltd is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.

We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Organisation structure

Transform Career UK Ltd. provides education, training, employment, and support to a wide range of learners from age 16 to adult.

## Our supply chains

The organisation has a number of suppliers for various parts of the organisation.

These include:

- Agency staff including teaching and business support
- Business partners
- Apprentice employers
- External contractors including advisors, cleaners, builders, caterers and consultants
- Guest speakers and lecturers
- Printing of College promotional materials
- Advertising, including digital and print
- Merchandise
- Photography
- Graphic design
- Sponsorship and charity.

## **Due diligence processes for slavery and human trafficking**

The organisation is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow centre policies. We will expect our suppliers to hold their own suppliers to the same high standards.

All employees and persons employed within the centre are asked to familiarise themselves with the organisations policy at the start of their employment or association, and are contractually obligated to adhere to the organisation's policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern day slavery or human trafficking within our own organisation.

The centre's supplier approval process incorporates a review of the controls undertaken by the centre's potential suppliers.

The centre will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking.

The centre has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

The vast majority of the centre's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

The centre also has a policy for the protection of whistleblowers, to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.

The steps we will take to further the goals of the Modern Slavery Act 2015 are:

- Conducting risk assessments to determine which parts of the centre and its suppliers are most at risk of modern slavery so that efforts can be focussed on those areas

- Engaging with our suppliers to convey to them the centre's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses

- Seek to introduce additional pre-screening measures for suppliers

- Introduce contractual provisions for our suppliers to confirm their adherence to centre policy

- Publishing this statement and policy on the centre's website to clearly display the centre's support to end modern slavery.

## **Responsibility for the policy**

Ultimate responsibility for the prevention and prevention of modern slavery within the centre rests with the organisations leadership team. Transform Career UK Ltd. has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.

Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy.



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## **Reporting modern slavery within Transform Career UK or its suppliers**

The centre's whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the centre or its suppliers may be reported by employees in this manner. The aforementioned policies apply to employees and may be found on SharePoint.

To surmise, any suspected instance of modern slavery or human trafficking within the centre or its suppliers must be reported to one of the centre's designated Safeguarding Officers, who will investigate and advise the appropriate people of any further actions.

The details of Safeguarding Officers are widely available to all staff members and are displayed on the back of staff ID badges, in the display stands at all campuses, and on the centres website.

## **Communication and awareness of this policy**

This policy is displayed on the centres website; the policy location is conveyed to all staff members at their induction.

## **Review**

The Modern Slavery Statement and Policy will be reviewed yearly by the centre's corporate management team in accordance with clause 6 of the Modern Slavery Act 2015.