



## Anti-Slavery and Human Trafficking Policy

### 1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business and the business of any clients.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including any business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### 2. RESPONSIBILITY FOR THE POLICY

2.1 We all have an overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Director of the Academy has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Director of Education.

### 3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager or the compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

# Hairforce 1 Training Academy

54 London Road, Romford, Essex, RM7 9QX  
Tel: 01708 762481

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our academy, or any of the various forms of modern slavery, raise it with your manager.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery, is part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all employees. TRAINING AND CONSULTANCY

## 5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION FROM THE BOARD

We are committed to improving our practices to combat slavery and human trafficking.

### ORGANISATION'S STRUCTURE

### OUR BUSINESS

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

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## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we aim to develop training for our staff.

## FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business we intend to look to develop a specific policy for inclusion in our existing business policies. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending July 2021.

Signed: