

Modern Slavery Policy

Introduction

This statement sets out Engage in Learning's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019

Engage in Learning recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Engage in Learning is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Engage in Learning:

- EiL is a supplier of e-Learning products to customers based in UK.

Countries of operation and supply

The organisation currently operates in the UK only but expansion to US and Europe are planned.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

High-risk activities

- Engage in Learning does not consider any of its activities to be high risk

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Managing Director
- **Risk assessments:** The Managing Director
- **Investigations/due diligence:** The Managing Director
- **Training:** All employees must undertake the in-house training course on Modern Slavery.

Relevant policies



The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- **Whistleblowing policy** The organisation 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 workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Managing Director in the strictest confidence.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Corporate and Social responsibility:** Employees are required to read and agree to comply with the Company's Corporate and Social Responsibility Policy.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include

- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:



- requiring all existing staff to have completed training on modern slavery by 30th May 2018.
- developing a system for supply chain verification expected to be in place by 30th June whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by 30th July 2018, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires all staff to complete an online training course within one month of the start of their employment with Engage in Learning.

The organisation's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

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