Modern Slavery and Human Trafficking Policy	
Version No	4.0
Operational from	September 2026
Policy prepared by	Director of Quality, Compliance & Excellence
Approved by	Educationwise Board
Annual assurance date	September 2027
Next full review	September 2028

Policy statement

Educationwise is committed to acting ethically, lawfully and with integrity.

Educationwise does not tolerate modern slavery, forced labour, human trafficking or the exploitation of children or adults within:

- Its own employment arrangements
- Its education and training provision
- Learner workplaces
- Subcontracted provision
- Activities carried out on its behalf
- Relevant parts of its supply chain

Educationwise will take action that is reasonable and proportionate to its activities and level of risk.

This includes:

- Maintaining fair recruitment and employment arrangements
- Remaining alert to signs of exploitation
- Providing clear reporting routes
- Responding promptly to concerns
- Protecting potential victims
- Completing proportionate checks on higher-risk subcontractors and suppliers
- Cooperating with safeguarding agencies, the police and other appropriate organisations
- Reviewing risks and lessons arising from any concerns

Purpose

The purpose of this policy is to explain:

- What modern slavery and human trafficking mean
- Where Educationwise may encounter modern slavery risks
- The responsibilities of staff and other parties
- How possible signs of exploitation should be reported
- How Educationwise will respond to concerns
- How relevant suppliers and subcontractors will be checked

- When specialist or statutory organisations will be contacted
- How the effectiveness of these arrangements will be reviewed

Scope

This policy applies to:

- Employees
- Directors and Board members
- Associates and contractors
- Temporary workers and consultants
- Learners and apprentices
- Employers where a concern relates to a learner
- Subcontractors and their staff
- Suppliers and service providers
- Recruitment agencies
- Delivery and business partners
- Anyone acting on behalf of Educationwise

It applies across:

- Apprenticeships
- Adult Learning Provision
- Commercial provision
- Direct delivery
- Subcontracted delivery
- Online and remote activity
- Recruitment and employment
- Learner workplaces
- Procurement and contract management

For this policy, **Adult Learning Provision** includes programmes currently funded through Advanced Learner Loans and any future adult education funding streams delivered by Educationwise.

Educationwise's risk profile

Educationwise is a predominantly online education and training provider.

Most teaching, learner support, administration and business activity is completed remotely through approved digital systems.

Educationwise does not operate a large estate, manufacture goods or directly employ a large manual or temporary workforce.

The areas in which Educationwise is more likely to encounter a modern slavery or exploitation concern include:

- An apprentice or learner's workplace
- A disclosure made by a learner during online teaching, reviews or safeguarding contact
- A subcontractor's recruitment or employment arrangements
- Use of associates, temporary workers or recruitment agencies
- Procurement of occasional goods such as equipment, uniforms or branded merchandise
- Suppliers using complex or unclear labour arrangements
- An individual being controlled by another person during remote communication
- Criminal or sexual exploitation involving a learner

Educationwise will focus its controls on these areas rather than apply unnecessary checks to every low-risk supplier.

Legal framework

This policy takes account of:

- The Modern Slavery Act 2015
- The Human Rights Act 1998
- The Equality Act 2010
- Employment and right-to-work legislation
- Health and safety legislation
- Safeguarding legislation and statutory guidance
- Relevant funding and contractual requirements

The Modern Slavery Act 2015 covers slavery, servitude, forced or compulsory labour and human trafficking.

Annual modern slavery statement

Section 54 of the Modern Slavery Act 2015 requires an annual modern slavery statement where an organisation:

- Is a corporate body or partnership
- Carries on business in the UK
- Supplies goods or services
- Has an annual turnover of at least £36 million

Educationwise is currently below this turnover threshold and is not legally required to publish a separate annual modern slavery statement. (GOV.UK)

Educationwise will:

- Check its turnover and legal position annually
- Publish a statement if it becomes legally required
- Provide reasonable assurance information where requested by a customer, funder or contracting organisation
- Consider voluntary publication where there is a clear business or transparency benefit

Maintaining this policy does not mean that Educationwise is legally required to produce a separate annual statement.

Definitions

Modern slavery

Modern slavery is the exploitation of a person who cannot freely leave or refuse the situation because of:

- Threats
- Violence
- Coercion
- Deception
- Abuse of power
- Abuse of vulnerability
- Debt
- Financial or practical control

Slavery and servitude

Slavery and servitude involve serious control over a person and restrictions on their freedom.

Forced or compulsory labour

Forced or compulsory labour is work or a service that a person is required to undertake under threat or penalty and has not offered to undertake voluntarily.

Human trafficking

Human trafficking involves arranging or facilitating another person's travel or movement with the intention of exploiting them.

A person does not need to have crossed an international border to have been trafficked.

Exploitation

Exploitation may include:

- Forced labour
- Labour exploitation
- Domestic servitude
- Sexual exploitation
- Criminal exploitation
- Forced begging
- Child exploitation
- Removal of organs
- Other situations where someone is controlled for another person's benefit

Potential victim

A potential victim is a person whose circumstances show possible indicators of modern slavery or trafficking.

Staff are not expected to prove that someone is a victim before reporting a concern.

Principles

Safety first

The immediate safety of a potential victim and any other person at risk will be the first consideration.

Prompt reporting

Staff must report concerns promptly and must not wait until they have proof.

Safeguarding

Where a concern involves a learner, child or adult at risk, Educationwise's Safeguarding and Prevent Policy will apply immediately.

Sensitive handling

Concerns will be handled sensitively and information will only be shared with those who need it to:

- Protect an individual
- Obtain specialist advice
- Make a safeguarding or criminal referral
- Support an investigation
- Meet a legal or contractual responsibility

Educationwise cannot promise absolute confidentiality.

Victim-centred response

Educationwise will consider whether an action could place the potential victim at greater risk.

Staff must not:

- Confront a suspected exploiter
- Alert an employer or another person who may be involved without advice
- Attempt to rescue someone themselves
- Make promises about the outcome
- Carry out a detailed investigation themselves
- Place themselves or another person in danger

Non-retaliation

No person will be disadvantaged for raising a genuine concern in good faith.

Proportionality

Supplier, subcontractor and recruitment checks will reflect the level of risk rather than applying the same process in every case.

Possible indicators

No single sign proves that modern slavery is taking place.

Possible indicators may include a person who:

- Appears frightened, withdrawn or controlled
- Is unable to speak freely
- Is accompanied by someone who answers for them
- Appears to have their movements or communication monitored

- Has their identity documents held by another person
- Has no control over their earnings or bank account
- Works excessive hours without suitable rest
- Receives little or no pay
- Has unexplained deductions or debts
- Lives in poor, unsafe or overcrowded accommodation
- Is transported to and from work under close control
- Appears injured, neglected or malnourished
- Has been misled about their work or conditions
- Cannot leave their employment freely
- Appears fearful of their employer or authorities
- Is threatened with harm to themselves or their family
- Is being forced into criminal or sexual activity
- Is a child carrying out work or activity that appears exploitative

Possible organisational indicators may include:

- Wages being paid to someone other than the worker
- Several workers using the same bank account or address
- Workers being unable to speak privately
- Unclear recruitment arrangements
- Recruitment fees or debt arrangements
- A subcontractor refusing reasonable information about its workforce
- Inconsistent employment, identity or payroll information
- A supplier using unexplained labour providers

Responsibilities

Chief Executive Officer

The Chief Executive Officer has overall executive accountability for this policy.

The Chief Executive Officer will:

- Ensure proportionate controls are in place
- Consider significant risks and concerns

- Approve serious organisational action
- Ensure the Board is informed where appropriate
- Ensure required external reporting is completed
- Confirm annually whether the statutory statement threshold applies

Senior Leadership Team

The Senior Leadership Team will:

- Support implementation of this policy
- Review significant concerns
- Consider relevant supplier or subcontractor action
- Ensure appropriate resources and advice are available
- Review annual assurance information
- Escalate significant matters to the Board

Director of Quality and Compliance

The Director of Quality and Compliance and Whistleblowing Contact will:

- Receive and coordinate concerns
- Involve the safeguarding team where appropriate
- Maintain oversight of decisions and actions
- Support proportionate risk assessment
- Coordinate external reporting where required
- Review themes and lessons
- Escalate significant risks through Educationwise's governance arrangements

Where a concern relates to Nick Preston, it should be reported to the Chief Executive Officer.

Designated Safeguarding Lead

The Designated Safeguarding Lead will:

- Assess risks to learners and other individuals
- Coordinate safeguarding action
- Seek advice from the police, local authority or other specialist organisation
- Support appropriate referrals
- Ensure that the safety of the potential victim remains central

- Maintain suitable safeguarding records

People and Culture support

Educationwise's People and Culture arrangements will support:

- Fair recruitment
- Right-to-work checks
- Clear employment terms
- Concerns involving staff, associates or contractors
- Appropriate investigation or employment action
- Checks involving recruitment agencies where used

Managers and contract owners

Managers and contract owners must:

- Understand relevant risks within their area
- Apply proportionate checks
- Use approved contracting processes
- Monitor relevant subcontractor or supplier concerns
- Escalate concerns promptly
- Protect relevant records
- Complete agreed actions

All staff, associates and contractors

Everyone working for or on behalf of Educationwise must:

- Act ethically
- Remain alert to possible signs of exploitation
- Complete relevant awareness activity
- Report concerns immediately
- Avoid confronting a suspected exploiter
- Avoid making promises of complete confidentiality
- Cooperate with safeguarding or investigative action
- Protect information and evidence

Learners and apprentices

Learners are encouraged to report concerns about:

- Their own circumstances
- Another learner
- Their workplace
- An employer
- A colleague
- A supplier or another organisation

Learners are not expected to investigate a concern themselves.

Suppliers and subcontractors

Relevant suppliers and subcontractors are expected to:

- Comply with applicable modern slavery legislation
- Maintain fair and lawful employment arrangements
- Report serious concerns affecting Educationwise activity
- Cooperate with proportionate checks
- Provide relevant assurance where reasonably requested
- Complete corrective action where weaknesses are identified
- Avoid retaliation against anyone who raises a concern

Recruitment and employment controls

Educationwise will maintain proportionate employment and recruitment controls, including:

- Identity checks
- Right-to-work checks
- Written terms and conditions
- Clear information about pay
- Appropriate payment arrangements
- Lawful deductions
- Suitable working hours
- Safe working arrangements
- Safer recruitment checks where required
- Routes for staff and contractors to raise concerns

Educationwise will not:

- Keep a person's passport or identity document beyond the time needed to complete a lawful check
- Require staff to pay Educationwise a recruitment fee
- Make unlawful deductions from pay
- Use threats or intimidation
- Prevent someone from leaving employment in accordance with their contract and the law

Right-to-work documentation does not by itself confirm that a person is not being exploited.

Learner workplace concerns

Educationwise recognises that a learner or apprentice may experience exploitation within their workplace.

Possible concerns may include:

- Wages being withheld
- Forced unpaid work
- Excessive or unsafe working hours
- Threats or intimidation
- Control of identity documents
- Control of wages or bank accounts
- Accommodation being used to control the individual
- The person being unable to leave their employment
- Criminal or sexual exploitation
- An employer controlling communication or movement
- Exploitation connected to immigration status or debt

Where a learner workplace concern is raised, Educationwise will:

1. Consider immediate safety.
2. Inform the safeguarding team.
3. Speak with the learner privately where it is safe to do so.
4. Avoid contacting the employer where this could alert a suspected exploiter or increase risk.
5. Obtain advice from an appropriate statutory or specialist organisation.

6. Support the learner to access appropriate help.
7. Consider any effect on the learner's education or training programme.
8. Record and review agreed actions.

Maintaining an apprenticeship or training programme will not take priority over a person's safety.

Online and remote delivery

As a predominantly online provider, staff may become aware of a concern through:

- A remote teaching session
- A progress review
- A wellbeing discussion
- A message or email
- A learner appearing controlled or monitored during a call
- Another person repeatedly speaking for the learner
- Sudden changes in the learner's circumstances
- A learner being unable to communicate privately
- Information provided by an employer or another learner

Where staff are concerned during an online interaction, they should:

- Avoid directly challenging another person who may be present
- Check whether the learner can speak privately where it is safe to do so
- Agree a safe way to make further contact where possible
- Report the concern immediately to the safeguarding team
- Record facts rather than assumptions
- Call emergency services where there is an immediate danger

Staff should not record an online conversation without an appropriate reason and authority.

Subcontractor checks

Subcontractors present a greater potential risk than most routine online suppliers because they may recruit staff, engage associates and deliver directly to learners.

Before appointment and during the relationship, Educationwise may check:

- Ownership and management
- Recruitment arrangements

- Employment or associate arrangements
- Right-to-work and safer recruitment controls
- Use of agencies or further subcontractors
- Relevant policies
- Reporting routes
- Previous concerns
- Contractual modern slavery commitments

Checks will be completed through Educationwise's existing subcontractor due-diligence and monitoring arrangements rather than through a separate unnecessary process.

Supplier checks

Educationwise uses suppliers such as:

- Online learning and business systems
- Cloud and technology providers
- Professional services
- Website and marketing services
- Office and technology equipment suppliers
- Occasional merchandise or uniform suppliers

Most routine suppliers are considered low risk and will not require a separate annual modern slavery declaration.

Additional checks may be completed where:

- Goods or services come from a recognised higher-risk sector or location
- Temporary or migrant labour is used
- The supplier uses complex subcontracting arrangements
- A concern or adverse report has been identified
- The contract is significant
- A customer or funding requirement requires additional assurance

Checks may include:

- Reviewing the supplier's published statement or policy
- Asking about recruitment and workforce arrangements
- Confirming the use of subcontractors

- Including suitable contract terms
- Seeking clarification or corrective action

Contractual expectations

Relevant subcontract and higher-risk supplier agreements may require the organisation to:

- Comply with modern slavery legislation
- Maintain suitable prevention arrangements
- Report relevant concerns
- Cooperate with reasonable assurance activity
- Provide information about further subcontracting
- Complete agreed corrective actions
- Protect anyone reporting a concern

These requirements do not need to be included in every low-risk routine purchase.

Reporting a concern

Concerns should be reported immediately to:

Nick Preston, Whistleblowing Contact and Designated Safeguarding Lead
Email: npreston@education-wise.org
Telephone: 0117 379 0450

Concerns may also be raised with:

- A tutor or coach
- A Programme Coordinator
- A line manager
- A member of the safeguarding team
- The Chief Executive Officer
- People and Culture support
- The route set out in the Public Interest Disclosure Policy

Where someone is in immediate danger, the police should be contacted on **999**.

For a non-emergency criminal concern, the police may be contacted on **101**. Advice or concerns may also be reported to the Modern Slavery and Exploitation Helpline on **08000 121 700**. (National Crime Agency)

Responding to a concern

When a concern is reported, Educationwise will:

- Assess whether anyone is in immediate danger
- Contact emergency services where required
- Inform the Designated Safeguarding Lead
- Record the information provided
- Avoid alerting a suspected exploiter
- Protect relevant evidence
- Consider the wishes and safety of the potential victim
- Obtain specialist advice
- Identify an appropriate statutory or specialist referral route
- Consider whether other learners or people may be affected
- Agree immediate and longer-term actions

Educationwise will not attempt to determine formally whether someone is a victim of modern slavery. This is the role of the appropriate statutory process.

National Referral Mechanism

The National Referral Mechanism is the UK framework for identifying and supporting potential victims of modern slavery.

Only designated First Responder Organisations can make a direct referral into the National Referral Mechanism. These include police forces, local authorities, the National Crime Agency and a number of designated charities. Educationwise is not itself a designated First Responder Organisation. (GOV.UK)

Where a referral may be appropriate, Educationwise will work with an organisation such as:

- The police
- The relevant local authority
- Another designated First Responder Organisation

For an adult, informed consent is normally required before an NRM referral is made.

A child does not need to consent to an NRM referral. A child must first be safeguarded and referred through the appropriate statutory route. (GOV.UK)

Educationwise will not complete or promise an NRM referral directly where it does not have authority to do so.

Concerns involving children

Where the potential victim is under 18 or may be under 18:

- The safeguarding team must be informed immediately

- Children's social care and/or the police will be contacted where required
- The child's safety will take priority
- Educationwise will not seek to investigate the trafficking or exploitation itself
- A designated First Responder Organisation will be asked to consider an NRM referral

Consent from the child is not required for an NRM referral. (GOV.UK)

Concerns involving adults

Where the potential victim is an adult, Educationwise will:

- Consider immediate safety
- Explain that specialist help is available
- Listen to the adult's wishes where possible
- Seek safeguarding or specialist advice
- Discuss referral to a designated First Responder Organisation
- Share information without consent only where there is a lawful reason, such as an immediate risk of serious harm
- Record decisions and reasons

The adult's refusal of support does not prevent Educationwise from calling emergency services where someone is in immediate danger or sharing information where another legal or safeguarding duty applies.

Supplier or subcontractor concerns

Where a concern relates to a supplier or subcontractor, Educationwise may:

- Seek immediate information
- Protect workers or learners at risk
- Pause relevant activity
- Increase monitoring
- Request a corrective action plan
- Restrict further subcontracting
- Obtain specialist advice
- Report the concern externally
- Suspend or terminate the relationship

The response will consider whether immediate termination could worsen the position of affected workers.

Investigations

Educationwise may investigate whether:

- Its own policies or controls were followed
- A staff member, contractor or subcontractor breached an agreement
- Further Educationwise activity may be affected
- Corrective action is required

Educationwise will not attempt to conduct a criminal investigation or interview a potential victim in detail about suspected trafficking.

Any internal review will:

- Be proportionate
- Protect confidentiality
- Avoid conflicts of interest
- Preserve relevant evidence
- Follow safeguarding and external advice
- Avoid interfering with police or local-authority activity

Support for potential victims

Depending on the circumstances, Educationwise may support a learner or staff member by:

- Agreeing a safe communication route
- Providing safeguarding support
- Making reasonable temporary changes to learning arrangements
- Supporting contact with specialist services
- Supporting an apprenticeship employer change or programme transfer where possible
- Considering a break in learning where appropriate
- Providing careers or practical signposting
- Maintaining appropriate contact
- Protecting the individual from retaliation

Educationwise is not a specialist accommodation, immigration, legal or therapeutic service.

The individual will be referred or signposted to appropriately qualified organisations where specialist support is required.

Training and awareness

Educationwise will provide proportionate awareness rather than requiring extensive specialist training for every member of staff.

All relevant staff will receive information covering:

- What modern slavery is
- Common indicators
- How to report a concern
- The importance of not confronting a suspected exploiter
- The link with safeguarding

More detailed guidance may be provided to staff involved in:

- Safeguarding
- Recruitment
- Subcontractor management
- Procurement or contract management
- People and Culture
- Employer engagement

Awareness may be delivered through:

- Induction
- Safeguarding training
- Policy updates
- Staff briefings
- Targeted refresher activity following a change or concern

The Home Office provides modern slavery awareness and First Responder training resources, although Educationwise staff do not become First Responders simply by completing training. (GOV.UK)

Records

Educationwise will maintain proportionate records of:

- Concerns and disclosures
- Safeguarding decisions
- External advice and referrals

- Subcontractor or supplier checks
- Corrective actions
- Training or awareness activity
- Significant decisions
- Lessons learned

Records will be:

- Accurate and factual
- Stored securely
- Restricted to authorised people
- Retained in line with Educationwise's Records Retention Schedule
- Shared only where necessary and lawful

A blanket six-year retention period will not automatically apply to every record.

Monitoring and annual assurance

The Senior Leadership Team will receive proportionate annual assurance covering:

- Whether the statutory turnover threshold applies
- Any concerns or referrals
- Relevant safeguarding themes
- Significant subcontractor or supplier risks
- Corrective actions
- Relevant training or awareness
- Any change in Educationwise's risk profile

Educationwise will not create unnecessary supplier questionnaires, audits or performance measures where the level of risk does not justify them.

Significant concerns or risks may be reported through:

- Senior Leadership Team
- Safeguarding and Prevent Committee
- Fraud and Error Committee where relevant
- Relevant risk registers
- Master Risk Committee
- The Board

Information will normally be reported without unnecessary personal details.

Review

This policy will receive a brief annual assurance check and a full review every two years.

It will be reviewed sooner where there is:

- A significant concern or incident
- A change in legislation or statutory guidance
- A change in Educationwise's turnover or legal obligations
- A material change to Educationwise's activities
- A significant new subcontracting or procurement arrangement
- An audit, inspection or contractual finding
- Evidence that existing controls are not effective

Related policies and procedures

This policy should be read alongside:

- Safeguarding and Prevent Policy
- Public Interest Disclosure Policy
- Ethics and Anti-Bribery Policy
- Counter Fraud and Error Policy
- Conflict of Interest Policy
- Data Protection Policy
- Safer recruitment arrangements
- Learner Code of Conduct Policy
- Learner Support Policy
- Subcontracting Policy
- Security Policy
- Contingency and Adverse Effects Management Policy
- Records Retention Schedule