

# **Modern Slavery Policy**

2025 - 2026

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### 1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced and compulsory labour, and human trafficking. All of these deprive individuals of their liberty for personal or commercial gain.

REACH Learning Provision has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our relationships, ensuring robust systems and controls are in place to prevent modern slavery within our Provision and supply chains.

This policy applies to all persons working for or on behalf of REACH in any capacity, including employees, volunteers, agency staff, contractors, consultants, external partners, and business representatives.

This policy does not form part of any employee's contract of employment and may be amended at any time.

### 2. Responsibilities

- Senior Leadership and Management: Ensure awareness, compliance, and training for staff under their responsibility.
- All Staff and Representatives: Must read, understand, and comply with this policy.
- Procurement and Supply Chains: Must ensure due diligence checks are carried out when engaging suppliers or contractors.

# 3. Compliance

- Preventing, detecting, and reporting modern slavery is the responsibility of all staff and partners.
- Staff must avoid any activity that might breach this policy and raise concerns immediately with their manager or via the Whistleblowing Policy.
- Concerns can relate to:
  - Treatment of workers
  - Working conditions
  - Suspected exploitation within the supply chain

If you are unsure whether certain practices amount to modern slavery, you must seek guidance from your manager.

### 4. Reporting Concerns

- Staff are encouraged to raise concerns as early as possible.
- All reports will be taken seriously and investigated appropriately.
- REACH supports a culture of openness and will protect any individual who raises concerns in good faith, even if mistaken.
- Retaliation or detrimental treatment for reporting concerns will not be tolerated.

#### 5. Communication & Awareness

- This policy and REACH's zero-tolerance approach will be communicated to all employees, volunteers, contractors, and partners at the start of any working relationship.
- Awareness will be reinforced through training and ongoing communication where relevant.

### 6. Breaches of Policy

- Employees who breach this policy will face disciplinary action, up to and including dismissal for gross misconduct.
- Contractors, suppliers, or partners who breach this policy may have their agreements terminated with immediate effect.

## 7. Monitoring & Review

- REACH will regularly review supply chains, partnerships, and recruitment practices to ensure compliance.
- This policy will be reviewed annually, or sooner if required by changes in legislation or best practice.