

# Modern Slavery & Human Trafficking Policy

## Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. This Policy applies to all staff, clients and contractors. This Policy should be read in conjunction with the Health and Safety Policy, the Equal Opportunities, Diversity and Inclusion Policy, the Safer Recruitment Policy and the Whistleblowing Policy.

## Statement of Intent

Axcis Education has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

Axcis Education also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

## Overview

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There can be a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour.

However, Axcis Education accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

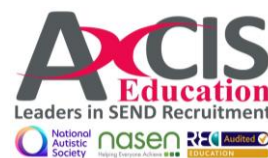
## Responsibility for the Policy

The HR Director has overall responsibility for ensuring that this Policy complies with Axcis Education's legal and ethical obligations.

The HR Director has day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in Axcis Education's business or supply chains.

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Line managers are responsible for ensuring that those reporting to them understand and comply with this Policy.

## Procedures

The prevention, detection and reporting of modern slavery in any part of Axcis Education's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for or under the control of Axcis Education. Staff and contractors are required to avoid any activity that might lead to a breach of this Policy.

If you believe or suspect a breach of this Policy has occurred or may occur, or there is any potential conflict with the Policy, you must notify your line manager or report it in accordance with Axcis Education's Whistle-blowing Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Axcis Education's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of Axcis Education's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also obtain further information via the Modern Slavery Helpline at [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org) for further information and guidance on modern slavery.

Axcis Education aims 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. Axcis Education is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## Training and Communication

Training on this Policy and on the risk that Axcis Education faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Axcis Education's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

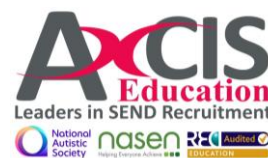
## Breach of the Policy

Any member of staff who breaches this Policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Axcis Education may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this Policy and/or are found to have been involved in modern slavery.

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## Communicating this Policy

This Policy is available on the Axcis Education website and is communicated to all contractors, clients and staff.

The contact details for Axcis Education are as follows:

Contact Point	Number or e-mail	Notes
Landline	0207 580 2956	Use during office hours
Martin Keddie	0207 580 2956	Associate Director – HR & Candidate Management
Sara Wills	0207 580 2956	HR & Training Director
E-mails	<a href="mailto:martin@axcis.co.uk">martin@axcis.co.uk</a> <a href="mailto:sara@axcis.co.uk">sara@axcis.co.uk</a>	E-mails are periodically checked out of hours

Signed: *Paul Gold*

Position: CEO

Date: 4<sup>th</sup> August 2020

Revision date: Annually

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