

Modern Slavery Policy

National Learning Group

1. Policy Statement

National Learning Group is committed to preventing modern slavery and human trafficking in all its forms within our business operations and supply chains. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, and tutors.

2. Our Commitment

We are committed to ensuring that:

- Modern slavery is not taking place in any part of our business or supply chains
- We implement and enforce effective systems and controls to prevent modern slavery
- We maintain transparency in our business and in our approach to tackling modern slavery throughout our operations
- We comply with the Modern Slavery Act 2015 and all other applicable laws and regulations

3. Our Business and Supply Chains

National Learning Group provides online tuition services through a network of carefully vetted tutors. We recognise that as an education service provider, we have a responsibility to ensure that all individuals working with or for us are treated fairly and with dignity.

Our supply chains include:

- Independent tutors and teaching professionals
- Technology service providers
- Professional service providers (legal, accounting, etc.)

4. Due Diligence Processes

To identify and mitigate the risks of modern slavery and human trafficking in our business and supply chains, we:

- Conduct thorough background checks on all tutors, including enhanced DBS checks
- Verify the right to work in the UK for all personnel
- Ensure all tutors and staff are paid fairly
- Maintain comprehensive records of all individuals working for or with us
- Regularly review our recruitment practices to ensure they are transparent and ethical
- Require all suppliers to confirm their compliance with the Modern Slavery Act 2015 where applicable

5. Risk Assessment and Management

We regularly assess the risk of modern slavery in our operations by:

- Identifying areas of our business and supply chains where risks may be higher
- Evaluating the effectiveness of our current controls
- Implementing additional measures where necessary
- Monitoring emerging risks and adapting our approach accordingly

Key risk areas we monitor include:

- Recruitment of tutors and staff
- Engagement with third-party service providers
- Use of agency workers or contractors

6. Reporting and Whistleblowing

We encourage all workers, tutors, students, parents, and other stakeholders to report any concerns related to modern slavery in our operations or supply chains.

Reports can be made:

- Directly to line management or Department Heads
- To the Human Resources Manager or Data Protection Officer
- To any member of the Senior Management Team
- Through our confidential whistleblowing procedure
- To the Modern Slavery Helpline on 08000 121 700

We guarantee that:

- All reports will be fully investigated
- No individual will suffer detriment as a result of reporting in good faith their suspicion that modern slavery is or may be taking place
- Appropriate action will be taken to address any confirmed instances of modern slavery

7. Breach of Policy

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

We may terminate our relationship with tutors, suppliers, and other business partners if they breach this policy or are found to be involved in modern slavery or human trafficking.

8. Performance Indicators

We will know the effectiveness of the steps we are taking to ensure that slavery and human trafficking are not taking place within our business or supply chains if:

- No reports are received from employees, tutors, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- Regular audits and reviews confirm compliance with this policy
- Training completion rates remain at 100% for all relevant personnel

• All suppliers provide confirmation of their compliance when requested

9. Review

This policy will be reviewed annually. Updates will be made as necessary to reflect changes in legislation, best practice, and our business operations.

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Approved by: Managing Director