



## **Modern Slavery Policy**

### **Introduction**

KEITS Training Services Ltd is committed to preventing modern slavery within our operations and where possible, our supply chain. We aim to act ethically and with integrity in all our business relationships and to ensure that our learners, employees, and contractors are not subjected to any form of modern slavery or abuse and are treated with dignity and respect. This policy reflects our commitment to comply with the Modern Slavery Act 2015.

### **Purpose**

This policy sets out KEITS Training Services Ltd.'s stance on modern slavery. It outlines the steps we are taking with the aim of protecting against modern slavery occurring in any part of our operations or supply chain, the process for reporting any concerns and the actions we will take if modern slavery is discovered.

### **Scope**

This policy applies to all employees, contractors, employers, learners, and third-party suppliers to KEITS Ltd who are involved in the delivery of services, training, or any part of the operations that involve interaction with learners or the community. It also applies to all suppliers, contractors, and partners who provide goods or services to us and includes the employers of our learners.

### **Definition of Modern Slavery**

Modern slavery encompasses slavery, servitude, forced or compulsory labour and human trafficking. It can occur in any industry or sector and may involve various forms of exploitation, including forced labour, sexual exploitation, and child labour. It is the exploitation of a person through coercion, control, or deceit.

### **Our Commitment**

KEITS Ltd is fully committed to the following principles:

- Working towards protecting against modern slavery in all areas of our business.
- Promoting a zero-tolerance approach to any form of modern slavery.
- Ensuring that employees, contractors, employer businesses, learners and other individuals associated with KEITS Ltd. are treated with dignity and respect.
- Engaging with our employees, contractors, employer businesses, learners and suppliers to raise awareness of modern slavery and ensure reporting procedures are clear and effective.

## **Our Approach**

To ensure that modern slavery does not occur within our training provider operations, we will:

- Provide training and guidance to all employees and learners to raise awareness of modern slavery as part of Safeguarding training. It will also form part of our induction process for new staff and be highlighted to those involved in recruitment and those working under contract to us.
- Review our policies and procedures regularly to ensure they are aligned with the Modern Slavery Act 2015 and current best practice.
- Ensure that recruitment practices comply with the highest ethical standards and that all employees are legally entitled to work in the UK.
- Implement clear and accessible reporting channels for employees, learners, and others to raise concerns or suspicions in respect of modern slavery.
- Encourage and support any individual who wishes to report suspected modern slavery in good faith without fear of retaliation.

## **Risk Assessment**

KEITS Ltd recognise that certain sectors and supply chains are more vulnerable to modern slavery risks than others. Within our operations we recognise a slightly elevated risk in respect of learners in the equine industry regarding labour exploitation, especially those working in particularly isolated areas. There is also a recognised increased risk for learners within the beauty industry.

We will ensure all learners in these sectors are made aware of the increased risk, that all employers and learners understand the national minimum wage structure and will check that learners are being provided with itemised wage slips and have a contract of employment in place which includes hours of work, days off and annual leave allowances.

## **Due Diligence and Supply Chain Responsibility**

We expect the highest standards of behaviour from all our suppliers, contractors, and partners. As part of our due diligence process, we will aim to build long term relationships with suppliers (including employer businesses) and make clear to all stakeholders our expectations regarding modern slavery. Those in breach of our expectations may face sanctions or termination of the business relationship with us, dependent on the severity of the breach.

## **Reporting and Accountability**

Individuals can report concerns regarding modern slavery within our operations through our Designated Safeguarding & Prevent Leads or by contacting an external body such as the Modern Slavery Helpline (08000 121 700).

We will take all reports seriously and will investigate any concerns raised promptly, ensuring appropriate action is taken. We guarantee that there will be no retaliation against any individual making a report in good faith.

KEITS Training Services Ltd will report criminal offences or suspected criminal offences to the police.

## **Monitoring and Review**

This policy will be reviewed annually by the Senior Management Team or sooner if any significant changes occur in our operations or legal requirements.

## **Policy Implementation**

This policy is endorsed by the Senior Management Team of KEITS Training Services Ltd and applies to all employees, contractors and business partners. It is the responsibility of all staff to uphold the principles outlined in this policy and to take appropriate action if they suspect any form of modern slavery.

<b>Location</b>	<b>Title</b>	<b>Responsibility</b>	<b>Date Created</b>	<b>Version/updated</b>	<b>Review Date</b>
Doc Con/Docs/ All Company Policies/Corporate	Modern Slavery & Exploitation Policy	DR	Mar'25	2 – Oct'25	Oct'26