Education Development Trust

Transforming lives by improving education around the world.

Education Development Trust

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Maintenance

Policy owner	**General Counsel & Company Secretary**
Review / Approval	February 2024
Next review	February 2025

Version Control

Version Number	Date
Version 5	February 2024
Version 4	November 2023
Version 3	February 2023

If you have questions about how to interpret this policy, please ask the Policy Owner – As above

1. SCOPE

This policy addresses modern slavery, which is a crime and a violation of human rights. Modern slavery exists where a person is exploited by others for personal or commercial gain. Whether tricked, coerced or forced, they lose their freedom. Examples include forced labour, debt bondage, forced marriage and human trafficking.

This policy applies to everyone who works on our behalf in any capacity, including trustees and directors, all employees, agency and seconded workers, contractors, suppliers, and subcontractors.

2. POLICY

Education Development Trust strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We aim to identify any concerns relating to slavery and human trafficking. We are committed to implementing systems and controls to ensure modern slavery does not take place in our organisation or our supply chains. We expect our suppliers to hold their own suppliers to the same standards. Violations of the policy will be regarded as a disciplinary matter or breach of contract, which may result in termination of employment or contracts/agreements as appropriate.

All staff will observe and honour the Anti-Slavery Policy Commitments (see Appendix).

Contract Owners and the In-House Counsel must include contract clauses to require compliance with the principles of this Policy.

Business Development must build into the new business process, notably partner due diligence and bid decisions, an assessment of the risk of modern slavery, encompassing all the examples cited above.

All staff must notify their line manager of any concerns regarding modern slavery. Managers must escalate concerns to senior management and / or Leadership Team and / or Corporate Governance where appropriate. Where concerns remain, refer to the Whistleblowing Policy.

Senior managers and / or Leadership Team must ensure concerns are included in Serious Incident reporting to Corporate Governance. Corporate Governance and the Company Secretary ensure that all concerns raised, together with treatment measures, are logged in the Potentially Reportable Serious Incidents log; and are reported to Leadership Team and Trustees as appropriate.

Corporate Governance co-ordinates an annual review of compliance and concerns against this policy and the attached policy commitments, and reports the results to Audit and Finance Committee.

The Board of Trustees approves an Anti-Slavery Statement each financial year, including a summary of the results of the annual review (issues and remedial actions). Corporate Governance ensures the annual statement is published on the website.

EDT is committed to supporting and protecting victims of trafficking, including where appropriate through providing access to medical care, legal assistance, and safe accommodations, as per the specific circumstances of the cases.

3. ROLES

All staff are responsible for:

- Reading this policy on induction, committing to its principles and engaging in training as required;
- Reporting modern slavery concerns as they arise, through the Whistleblowing Policy if necessary.

The Strategic Growth Director is responsible for bids and partner due diligence compliance with this policy.

Contract Owners are responsible for contract compliance with this policy.

Audit and Finance Committee is responsible for monitoring compliance with the policy.

4. RELATED DOCUMENTS

Policies

- Whistleblowing policy

Procedures / guidance / forms

- Anti-Slavery Statement

Regulatory

- Modern Slavery Act 2015

5. APPENDIX: ANTI-SLAVERY POLICY COMMITMENTS

To the extent possible, we ensure our staff and supply chain, including subcontractors, adhere to the following principles.

1. Treatment of workers

- We adhere to local and national labour laws.
- Workers have freedom to terminate their employment.
- Workers have freedom of movement and association.

- Workers are not subject to any threat of violence, harassment or intimidation.
- Worker-paid recruitment fees and compulsory overtime are prohibited.
- Child labour is prohibited.
- Discrimination is prohibited.

2. Purchasing practices

- Unreasonable practices are prohibited, such as: -
- Unreasonably aggressive pricing that does not consider sustainable production costs;
- Short lead times and untimely high-volume orders;
- Inaccurate forecasting;
- Late or extended payments;
- Last-minute withdrawal from contracts without reasonable cause;
- Unfair penalties (despite last minute changes);
- Inaccurate technical specifications.

3. Debt Bondage

- We use direct recruitment methods where possible.
- We monitor the terms of indirect recruitment providers (e.g. agencies).
- We consider terms that may require workers to incur financial debt to us.
- We monitor recruitment practices and consider corrective action plans .

4. Whistleblowing

- Workers in our supply chain have access to an anonymous mechanism to report modern slavery concerns in a language they understand and without risk of penalty.
- Partners / subcontractors / suppliers have equivalent policy in the area of modern slavery.
- Concerns raised by supply chain workers are included in reports to Audit and Finance Committee.
- We adopt the following principles re concerns raised: a prompt and victim-centred response; safeguard victims and support them in receiving justice and compensation; do not automatically terminate contracts where third parties are cooperating with authorities, actively implementing corrective actions and are not complicit; require suppliers to provide a corrective action plan.

5. Forced Labour

- We are not involved in, nor support the recruitment, harbouring, transportation, provision, or obtaining of a person through the use of force, fraud, or coercion for the purpose of involuntary servitude, peonage, debt bondage, or forced labour.
- Staff are aware of the following indicators of forced labour and how to report concerns: abuse of vulnerability; deception; restriction of movement; isolation; physical and sexual violence; intimidation and threats; retention of identity documents; withholding of wages; debt bondage; abusive working and living conditions; excessive overtime.
- Staff receive training re modern slavery, including how the above issues might link to their work.

Sex Trafficking

- We are not involved in, nor support the recruitment, harbouring, transportation, provision, or obtaining of a person through the use of force, fraud, or coercion for the purpose of engaging them in commercial sex acts.

6. Performance Indicators

- As part of the annual review, we will assess compliance against indicators such as: -
- New starters, staff, and high-risk subcontractors have received training;
- Due diligence has been done on new partners / subcontractors / suppliers;
- Whistleblowing reports have been appropriately handled;
- The policy has been updated annually;
- Actions from the previous report have been completed.