

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

## TTT POLICY DOCUMENT

# Anti-Slavery and Human Trafficking Policy

*TTT's zero-tolerance position on modern slavery and human trafficking across its operations and supply chain.*

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## Document Control

<b>Document Title</b>	Anti-Slavery and Human Trafficking Policy
<b>Version</b>	1.0
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<b>Policy Owner</b>	Phenil Mehta, Centre Manager
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<b>Approved By</b>	Phenil Mehta, Centre Manager
<b>Classification</b>	Public
<b>Applies To</b>	All TTT staff, associates, contractors, volunteers, learners, resellers and suppliers

# Anti-Slavery and Human Trafficking Policy

## 1. Purpose

This policy sets out TTT's zero-tolerance position on modern slavery, human trafficking, servitude and forced or compulsory labour across its operations, workforce and supply chain. It demonstrates TTT's commitment to ethical practice in line with the Modern Slavery Act 2015, even though TTT's turnover sits below the statutory threshold for a Modern Slavery Statement. TTT chooses to hold itself to the same standard expected of larger organisations, because learners, **Awarding Organisations** and the sector deserve that assurance.

## 2. Scope

This policy applies to:

- All TTT employees, associates, contractors, volunteers and directors
- All TTT resellers, suppliers and significant commercial partners
- TTT learners, where they raise concerns about modern slavery affecting themselves or others
- All TTT operations, including online delivery, administrative services and physical premises

## 3. Definitions

The following terms carry the meanings given in the Modern Slavery Act 2015 and associated statutory guidance.

<b>Modern Slavery</b>	An umbrella term covering slavery, servitude, forced and compulsory labour and human trafficking. Victims are coerced, deceived or forced into activities against their will.
<b>Slavery</b>	The situation where ownership is exercised over a person, contrary to Article 4 of the European Convention on Human Rights.
<b>Servitude</b>	The obligation to provide services imposed by coercion, including the obligation to live on another's property and the impossibility of changing the condition.
<b>Forced or Compulsory Labour</b>	Work or service exacted from a person under the menace of a penalty, for which the person has not offered themselves voluntarily.
<b>Human Trafficking</b>	The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, abduction, fraud or deception for the purpose of exploitation.
<b>Exploitation</b>	Includes slavery, servitude, forced labour, sexual exploitation, removal of organs <b>and</b> securing services, benefits or advantages from a person through coercion.
<b>Supply Chain</b>	The network of suppliers and sub-suppliers whose services or goods contribute to the products and services TTT delivers.

## 4. Policy Statement

TTT is committed to the following principles and commitments.

1. TTT has a zero-tolerance approach to modern slavery and human trafficking in every part of its activity and supply chain.
2. TTT complies with the Modern Slavery Act 2015 and, although not currently required to publish a statutory Modern Slavery Statement, voluntarily applies the statement's principles.
3. Every person working for TTT is engaged lawfully, has confirmed right to work, holds their own identity documents and is paid in line with the National Minimum Wage and National Living Wage rates set by the UK Government.
4. TTT conducts risk-based due diligence on new resellers, suppliers and significant contractors, proportionate to size and risk exposure.
5. Contracts with resellers and significant suppliers include anti-slavery clauses giving TTT the right to audit and to terminate for material breach.
6. Every staff member and associate is made aware of this policy and knows how to recognise and report concerns.
7. Concerns raised in good faith are handled promptly, confidentially and without detriment to the person raising them, consistent with the Whistleblowing Policy.
8. Where TTT encounters credible evidence of modern slavery, it reports to the relevant authority (Modern Slavery Helpline, Police, National Referral Mechanism) without delay.

## 5. Roles and Responsibilities

Role	Responsibility
<b>Centre Manager (Phenil Mehta)</b>	Overall accountability; owns the policy; approves supplier due diligence; leads investigations; liaises with authorities; reports to the Alternative Contact where personally conflicted; reviews this policy annually.
<b>Alternative Contact (Shaily Mehta)</b>	Receives concerns where the Centre Manager is the subject or is conflicted; engages external support where needed.
<b>Course Coordinator</b>	Administers supplier due diligence and the supplier register; logs concerns in the Incident Register; coordinates training records.
<b>All staff, associates, contractors and volunteers</b>	Know the indicators; report concerns promptly; comply with this policy in their own conduct; cooperate with investigations.
<b>Resellers and suppliers</b>	Accept the contractual anti-slavery clause; cascade equivalent obligations to their own sub-suppliers; cooperate with any audit; notify TTT of concerns without undue delay.

## 6. TTT's Risk Profile

TTT delivers online vocational training in the UK. Its operational risk of direct involvement in modern slavery is low, but not zero. The following areas carry the most exposure and are monitored accordingly.

Area	Typical risk considerations
Resellers and third-party agents	Misrepresentation of course benefits to vulnerable individuals; recruitment of learners who are themselves being exploited and funnelled into training as part of a broader scheme.
Overseas learners	Individuals who may be in the UK under coercive conditions; indicators include third-party controlling enrolment, payment or contact.
IT hardware and consumables	Electronics and associated minerals have a known global exposure; TTT prefers suppliers that publish responsible-sourcing information.
Contracted services	Cleaning, postage, print, hospitality where used; preference for suppliers who comply with the Modern Slavery Act or who voluntarily follow equivalent standards.
Associates engaged as self-employed contractors	Confirmation that each is genuinely self-employed, holds their own ID and bank account and is not being controlled by a third party.

## 7. Indicators of Modern Slavery

Every staff member and associate is trained to recognise the following indicators. Indicators are not proof, but any combination warrants further care and, where credible, a referral to the authorities.

- A third party speaks for the individual, handles their identity documents or controls their access to money
- The same contact details or bank account are used for multiple unrelated learners
- The individual appears anxious, withdrawn, rehearsed or inconsistent in their account of themselves
- Signs of physical injury, under-nourishment or inappropriate clothing
- The individual has limited or no personal identification or is reluctant to discuss where they live
- The individual appears to be moved by others between locations and is reluctant to travel alone
- Payment for an enrolment is made by a third party who also controls course choice and contact
- A supplier's pricing is implausibly low relative to the market, with weak or unverifiable labour practices
- Workers at a supplier site are reported to live in the workplace, lack freedom of movement or have no contract

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## 8. Internal Controls

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### 8.1 Workforce

- Every staff member, associate, contractor and volunteer is recruited under the Safer Recruitment Policy, including Right to Work verification and identity checks
- Each individual holds their own identity documents and controls their own bank account into which they are paid
- Payment is at or above the National Minimum Wage or National Living Wage as applicable or at proper professional rates for associate services
- Working hours are reasonable and recorded; no individual is required or encouraged to work under duress

### 8.2 Supply chain and resellers

- Before engagement, new resellers and significant suppliers are asked to confirm their anti-slavery position, typically by signing or acknowledging TTT's anti-slavery clause
- Contracts include a right to audit and a right to terminate for material breach
- Large suppliers who publish a Modern Slavery Statement under Section 54 of the Modern Slavery Act 2015 are preferred; their statement is checked at onboarding and annually
- Where a supplier cannot or will not meet these expectations and the service cannot be secured elsewhere, TTT records the residual risk and the steps taken to mitigate it

### 8.3 Learner-facing

- At enrolment, TTT verifies identity, confirms direct contact and ensures that the learner makes their own decision about the course
- Where a sponsor or employer pays on a learner's behalf, TTT retains the direct relationship with the learner, including for course-delivery communication, under the Reseller Policy and Agreement and the Course Terms and Conditions
- Course Tutors, Assessors and IQAs who observe anything that suggests a learner is being coerced, controlled or isolated route the concern to the Designated Safeguarding Lead (Phenil Mehta) without delay under the Safeguarding and Prevent Duty Policy

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## 9. Reporting Concerns

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Any staff member, associate, learner or third party with a concern about modern slavery or human trafficking affecting any person connected to TTT reports it through one of the following routes.

### 9.1 Immediate danger

- If a person is in immediate danger: call 999 (Police and ambulance)
- Modern Slavery and Exploitation Helpline: 08000 121 700 (24 hours) for urgent advice and referral

### 9.2 Internal reporting

- Concerns are reported to the Centre Manager at phenil@theteachertrainer.co.uk or 01908 736 777

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- Where the concern involves the Centre Manager or the Centre Manager is otherwise conflicted, concerns are reported to the Alternative Contact (Shaily Mehta, shaily@theteachertrainer.co.uk)
  - Any staff member can raise a concern anonymously or confidentially through the Whistleblowing Policy, which provides protection under the Public Interest Disclosure Act 1998

### 9.3 External reporting

- Modern Slavery and Exploitation Helpline (Unseen UK): 08000 121 700 or modernslaveryhelpline.org
- Police: 101 for non-urgent reports, 999 for emergencies
- National Crime Agency (NCA) Modern Slavery Human Trafficking Unit: via nationalcrimeagency.gov.uk
- Gangmasters and Labour Abuse Authority (GLAA): 0800 432 0804
- National Referral Mechanism (NRM): the statutory framework for identifying and supporting potential victims, accessed through first-responder organisations
- Crimestoppers (anonymous): 0800 555 111

## 10. How TTT Handles a Concern

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1. The concern is acknowledged in writing within 3 working days of receipt (where contact details are provided).
2. The Centre Manager (or Alternative Contact) assesses the information and takes immediate action to protect any person at risk, including contacting authorities where appropriate.
3. Where a learner may be a victim, safeguarding steps under the Safeguarding and Prevent Duty Policy are activated in parallel.
4. A proportionate investigation is carried out, typically within 28 calendar days, with external expertise engaged where the matter is complex.
5. An outcome is communicated to the person raising the concern (subject to lawful restrictions), with action taken and next steps set out.
6. Lessons are fed back into the policy, supplier list and staff training.

## 11. Protection from Detriment

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- No staff member, associate, contractor, volunteer, learner or third party will suffer detriment for raising a concern in good faith
- Retaliation against a person raising a concern is a serious breach of the Staff Code of Conduct and is handled under the Staff Disciplinary and Sanctions Policy
- Protection extends to victims themselves; TTT supports potential victims through the National Referral Mechanism and does not take immigration or commercial action that would penalise a victim

## 12. Breach of This Policy

Breach of this policy is treated with the utmost seriousness.

- Staff and associates face action under the Staff Disciplinary and Sanctions Policy, up to and including dismissal and referral to the Disclosure and Barring Service, the Police and any relevant professional register
- Resellers face suspension or termination under the Reseller Policy and Agreement, alongside referral to authorities where criminal conduct is suspected
- Suppliers who do not uphold equivalent anti-slavery standards **and** who cannot demonstrate progress, are removed from TTT's approved list

## 13. Training and Awareness

Audience	Content	Frequency
All staff and associates	Modern slavery indicators, reporting routes, supplier expectations, this policy	Induction and annual refresh
Centre Manager and Course Coordinator	Supplier due diligence; learner safeguarding links; investigation and reporting routes	Annual
Resellers and significant suppliers	Contract-based acknowledgement of this policy at onboarding and annually	Annual

## 14. Records and Retention

- Signed supplier anti-slavery acknowledgements are held in the supplier register for the life of the engagement plus 6 years
- Concerns raised, investigations and outcomes are retained for 6 years after case closure **or** longer where the **Awarding Organisation** or law requires
- Personal data is processed under the Data Protection and GDPR Policy; victim-related information is held with heightened confidentiality

## 15. Voluntary Transparency

Although TTT is below the Section 54 Modern Slavery Act threshold that requires publication of an annual Modern Slavery Statement, TTT chooses to:

- Publish this policy openly on its website
- Include anti-slavery expectations in reseller and significant supplier contracts
- Review and summarise its anti-slavery activity annually in its internal self-evaluation

- Publish a short voluntary statement summarising its position should the scale of TTT's operations change such that publication would add value to learners, partners and the sector

## 16. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by legal or statutory guidance changes, significant incidents, a change in TTT's size or international activity or identified weaknesses in the supply chain. All outcomes are recorded in the Version History at Section 18.

## 17. Related Documents

This policy should be read alongside:

- Safeguarding and Prevent Duty Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy
- Conflict of Interest Policy
- Anti-Bribery and Corruption Policy
- Staff Disciplinary and Sanctions Policy
- Reseller Policy and Agreement
- Fair Access and Admissions Policy
- Equality, Diversity and Inclusion Policy
- Data Protection and GDPR Policy
- Data Retention and Disposal Policy

## 18. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	A new standalone policy aligned with the Modern Slavery Act 2015. Although TTT sits below the Section 54 threshold for a statutory Modern Slavery Statement, the centre voluntarily adopts equivalent standards. Covers definitions, workforce controls, supply-chain due diligence, learner-facing indicators, reporting routes (Modern Slavery Helpline, NCA MSHTU, GLAA, NRM), internal handling and voluntary transparency commitments.

## 19. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta

Name

*P Mehta*

Signature

22/04/2026

Date