**Mr L’s Online English.com**

**ANTI-SLAVERY POLICY**

**INTRODUCTION**

Modern slavery is a crime resulting in despicable abuse of human rights. The **Modern Slavery Act (MSA) 2015** came into force as from **March 2015** and consolidates slavery and trafficking offenses. It covers four activities:

* •  Slavery;
* •  Servitude;
* •  Forced or compulsory labour;
* •  Human trafficking.

It ensures that offences are subject to the toughest asset recovery regime under the **Proceeds of Crime Act 2002**. The National Crime Agency, the police and other law enforcement agencies have the powers to bring to justice those engaged in human trafficking and slavery.

Modern slavery is a complex and multi-faceted crime and tackling it requires all staff of **Mr L’s Online English.com** to play a part. Protecting our workforce and reputation is vital. The **MSA 2015** highlights the important need for the Firm to play a part in tackling slavery.

The **Transparency in Supply Chains Clause** which came into force **October 2015** requires organisations with **a turnover of £36m or more** to report on processes and **due diligence taken** **to ensure that their supply chains are slavery free**, and to produce and publish a slavery and human trafficking statement each financial year.

RISK

The principal areas of risk **Mr L’s Online English.com** faces, related to slavery and human trafficking, include, but are not limited to the following:

* •  Supply chains:
* •  Outsourced activities;
* •  Corporate hospitality;
* •  Recruitment through agencies;
* •  General recruitment.

**Mr L’s Online English.com** will manage these risks through our procedures set out in this policy.

RESPONSIBILITIES

**Mr L’s Online English.com** and its employees have a responsibility to ensure all colleagues and Business Partners are safeguarded, treated fairly and with dignity. This policy must be observed and any serious concerns which are raised will be dealt with as appropriate and may trigger the Firm's disciplinary procedures.

**Mr L’s Online English.com** will:

* •  maintain clear policies and procedures preventing exploitation and human trafficking, protecting our colleagues, Business Partners and our reputation;
* •  be clear about our recruitment policy;
* •  monitor our supply chains;
* •  make appropriate checks on all employees, recruitment agencies, suppliers, etc.;
* •  have in place an open and transparent grievance process for all staff.

Supervisors and Line-Managers will:

* •  listen and be approachable to colleagues;
* •  respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
* •  remain alert to indicators of slavery;
* •  raise awareness by discussing issues and providing training;
* •  use their experience and professional judgement to gauge situations.

Colleagues must:

* + •  follow the reporting procedure if there is any suspicion of a colleague or someone in our supply chain being controlled, or forced by someone else, to work or provide services;
  + •  follow the reporting procedure if a colleague tells them something that may indicate they are or someone else is being exploited or ill-treated.

**ANTI-SLAVERY STATEMENT**

**Mr L’s Online English.com** will make a clear annual statement which will show a summary of the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of the business or our supply chains. It will be published on our website at the end of each financial year. The company will show that improvements can be made. The statement will also show:

* •  the organisation structure, our business and supply chains;
* •  our policy in relation to slavery and human trafficking;
* •  the due diligence processes in relation to slavery and human trafficking;
* •  the parts of the business and supply chains where there is a risk of slavery and human trafficking, and what steps are being taken to assess and manage that risk;
* •  training available to staff about slavery and human trafficking.

The statement will be approved by the members and signed by a designated **member. The Firm will publish**

**RISK ASSESSMENT**

* + •  Identifying suppliers by total spend/goods or services/location;
  + •  Employment;
  + •  Sector;
  + •  Relationship;
  + •  Supply chains (a supplier is any individual or company which provides goods or services);
  + •  We (the Firm) will thoroughly check supply chains to ensure the potential for slavery and human

trafficking is significantly reduced (see supplier questionnaire);

* + •  We will inform companies that we do business with that we are not prepared to accept any form of exploitation;
  + •  Our supplier contracts will contain an anti-slavery clause which prohibits suppliers and their employees from engaging in slavery or human trafficking;
  + •  Each step of the supply process will be accounted for. We will know who is providing goods and services to us, and we will have mechanisms and processes in place to check, including;
  + •  Risk assessing suppliers;
  + •  Auditing suppliers.

**RECRUITMENT USING AGENCIES**

**Mr L’s Online English.com** will only use agreed specified reputable recruitment agencies;

Recruitment agencies will be checked to reduce the potential for slavery and human trafficking, and placed on our **list of approved agencies**. This will be achieved by:

* •  Conducting background checks;
* •  Investigating reputation;
* •  Ensuring supplied staff have the appropriate paperwork;
* •  Ensuring assurances are provided by the agency that the appropriate checks have been made on the supplied person(s);
* •  The list of approved recruitment agencies will be reviewed at least every three years.

**GENERAL RECRUITMENT**

* •  All staff will have a **written contract of employment** and will not be asked to pay any direct or indirect fees to obtain work;
* •  **Mr L’s Online English.com** will ensure staff are legally able to work in the UK;
* •  Names and addresses of staff will be checked to identify a high number sharing occupancy (often a factor for those being exploited);
* •  Information will be provided to all new recruits on their statutory rights including sick pay, holiday pay, and any other benefits they be entitled to;
* • **Mr L’s Online English.com** will follow the Firm's reporting procedure should they suspect someone is being exploited.

**IDENTIFYING SLAVERY**

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. The following list of indicators, which is not exhaustive, could trigger suspicions that someone may be a slavery or trafficking victim. The person:

* •  may **not be in possession of their own passport, identification or travel documents**;
* •  will **allow others to speak for them** when spoken to directly;
* •  will be **withdrawn or appear frightened**;
* •  does **not seem to be able to contact friends or family freely**;
* •  has **limited social interaction or contact with people** outside their immediate environment. A person may display a number of the indicators as set out above but they may not necessarily be a victim of slavery or trafficking.

**REPORTING**

If staff of **Mr L’s Online English.com** have any concerns, they should raise with Mr Luis Lozano and / or Ms Elizabeth Hunter, co directors of **Mr L’s Online English.com**. If staff believe the victim may be in immediate danger, staff must dial **999**. Please be aware though, that not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk.

**TRAINING**

**Mr L’s Online English.com** will provide ongoing general awareness training by means of a PowerPoint presentation. This is accessible to all our colleagues via directors Mr Lozano & Ms Hunter. **Mr L’s Online English.com** will also provide specialist training to those who are specifically involved in managing recruitment and our supply chains.

**MONITORING**

**Mr L’s Online English.com** will monitor our procedures and review the Anti-Slavery policy regularly and at least annually on publication of the Firm's annual statement. We will provide information and (if necessary) training on any changes which are made.