



# Anti-Slavery Policy

## Introduction

Spectrum Tutors is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking. This Anti-Slavery Policy reflects our promise to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

## Scope

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, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

## Relevant Legislation

Spectrum Tutors adheres to the following UK legislation regarding anti-slavery and human trafficking:

- **Modern Slavery Act 2015** - This act consolidates previous offenses relating to trafficking and slavery. Under this Act, Spectrum Tutors meets its responsibilities for publishing an annual Modern Slavery Statement, detailing the steps taken to prevent slavery and human trafficking in our operations and supply chain.
- **Human Rights Act 1998** - Ensures all individuals are entitled to fundamental rights and freedoms, safeguarding against slavery practices.
- **Employment Rights Act 1996** - Outlines the rights of employees in the workplace, providing a foundation to ensure fair treatment.

## Responsibilities

### Management

- Ensure all staff understand and comply with this policy and the implications of the Modern Slavery Act 2015.
- Assess risks and exposure to potential slavery and human trafficking in our operations and supply chain.
- Develop and implement effective due diligence processes.

### Employees/Contractors

- Compliance with all laws and adherence to this policy.
- Report any concerns about slavery or human trafficking in any parts of our business or supply chains.

### Actions to Address Modern Slavery

- **Risk Assessment:** Regularly assess parts of the business and supply chains that might be at risk of slavery and human trafficking and take appropriate actions.
- **Due Diligence Processes:** Conduct due diligence on vendors, suppliers, and contractors to ensure compliance with this policy and the law.
- **Training:** Provide training on modern slavery and human trafficking to ensure a high level of understanding and awareness among our staff.
- **Reporting Concerns**
- All employees, customers, and suppliers are encouraged to report any suspicion of slavery or human trafficking without fear of retaliation. Reports can be made anonymously and will be thoroughly investigated.

### Breaches of the Policy

Any breach of this policy will be taken seriously and may lead to disciplinary action, which could result in dismissal for misconduct or gross misconduct. Spectrum Tutors may terminate its commercial relationship with individuals and organizations working on our behalf if they breach this policy.

This Anti-Slavery Policy sets out Spectrum Tutors' stance on modern slavery and demonstrates its ongoing commitment to acting ethically and with integrity in all its business relationships.