

ISSUE YEAR	ISSUE MONTH
2023	May
APPROVED BY	
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SIGNATURE	
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REVISION DATE	
	May 2025

Modern Slavery and Human Trafficking Policy

Changes made to policy since last issue:

P2, Column 2, Recruitment Practices, text added: "RPL operates both a Safer Recruitment and Selection Policy, and DBS Checks Policy."

Introduction

This policy applies to all persons working for, or on behalf of, Release Potential Ltd (RPL) in any capacity including employees at all levels.

RPL forbids the use of modern slavery and human trafficking in all of our operations and supply chains. We are committed to ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

We expect that our suppliers will hold their own employees and suppliers to the same high standard.

Definitions

Modern Slavery – the recruitment, movement, harbouring, or receiving of human beings through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.

Human Trafficking – the arranging or facilitating of travel of another person with a view to that person being exploited.

Organisation

RPL operates from the Northeast and throughout England, providing education and training to learners. As the company does not have an annual turnover of £36 million or above we are not defined as a commercial organisation under the Modern Slavery Act. However, this policy demonstrates our clear commitment.

Due diligence process

RPL will identify and mitigate the risks of modern slavery occurring by adopting due diligence processes that are proportionate to any risk areas identified (dependant on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

RPL has systems in place to:

- Identify and assess the potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains

- Protect whistle blowers

The company identified the following as the principal areas of potential risk:

- Supply chains/procurement
- Recruitment practices
- Lack of awareness of staff regarding their obligations under the Modern Slavery Act 2015

Supply chains

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, RPL procurement function will manage the risk of exploitation from potentially high-risk items known or likely to have come from high-risk countries (i.e. clothing) by requesting Modern Slavery Policies from these companies.

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or RPL own policies and procedures, may be removed from our supplier list and will not be considered for future supply to the Company unless they can demonstrate that these compliance requirements are met.

Further work will also include an analysis of the current suppliers who meet the turnover criteria, and for these organisations a request for their policy will be made and recorded. For suppliers who are under the threshold we will ask that they comply with our policy.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, RPL provide training to our staff. We also require our business partners to provide training to their staff, suppliers and providers.

Recruitment practices

RPL operates both a Safer Recruitment and Selection Policy, and DBS Checks Policy.

All newly appointed staff, permanent or temporary, must (as a minimum) supply the following information:

- Identity (Name, Date of Birth and Address)
- UK passport number
- UK Driving Licence
- Right to work in the UK
- Possession of relevant qualifications
- DBS disclosure check
- Overseas checks (if a potential employee has lived outside of the UK, further checks may be obtained)

Where an individual is unable to supply key data (e.g. right to work in the UK) the company will discharge its obligation to draw such matters to the relevant UK Authority.

Performance

This policy will be made available to all staff members, stakeholders and general public. We will also seek to raise awareness of the risks of modern slavery amongst staff and learners by other measures, including discussion of this

policy during the induction process for new employees.

Having assessed the training needs for staff operating in different parts of RPL we will look at devising and implementing training and awareness-raising methods attuned to those staffing groups.

Direct Action

If you suspect modern slavery or human trafficking is happening report it to:

Modern Slavery Helpline:	08000 121 700
Police:	101
In an emergency call:	999