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# Modern Slavery and Human Trafficking Policy

## 1. Purpose

Theorise Ltd is committed to conducting business ethically, responsibly and with integrity.

The purpose of this policy is to:

- Prevent modern slavery and human trafficking.
- Promote ethical working practices.
- Ensure compliance with the Modern Slavery Act 2015.
- Support the identification and reporting of concerns.
- Promote awareness of modern slavery risks within our operations and supply chains.
- Demonstrate our commitment to protecting the rights, dignity and welfare of all individuals connected with our organisation.

Theorise Ltd has a zero-tolerance approach to modern slavery and human trafficking and expects the same commitment from all individuals and organisations with whom it works.

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## 2. Scope

This policy applies to:

- Directors
- Employees
- Support Staff
- Agency Workers
- Self-Employed Consultants
- Contractors

- Temporary Workers
- Volunteers
- Suppliers
- Business Partners
- Any individual acting on behalf of Theorise Ltd

The policy applies to all business activities undertaken by or on behalf of Theorise Ltd.

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### **3. Statement of Commitment**

Theorise Ltd is committed to acting ethically and with integrity in all of its business dealings and relationships.

We are committed to implementing and maintaining effective systems and controls designed to prevent modern slavery and human trafficking from occurring within our organisation or supply chains.

Modern slavery is a serious criminal offence and a violation of fundamental human rights. It can take many forms including:

- Slavery
- Servitude
- Forced labour
- Compulsory labour
- Human trafficking
- Exploitation of vulnerable individuals

Theorise Ltd recognises that identifying victims of modern slavery can be challenging because exploitation may present in different ways and may not always be immediately apparent.

Although Theorise Ltd operates primarily within the educational support sector and therefore faces a lower risk of modern slavery than some industries, we recognise that modern slavery can occur in any sector and remain committed to identifying and addressing risks wherever they arise.

Theorise Ltd accepts its responsibility to ensure that workers are not exploited, that appropriate employment practices are followed and that relevant employment, health and safety and human rights legislation is respected throughout its operations and business relationships.

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#### **4. Responsibilities**

All individuals engaged by Theorise Ltd are responsible for:

- Complying with this policy.
- Remaining alert to indicators of modern slavery and exploitation.
- Reporting concerns promptly.
- Cooperating with investigations where appropriate.
- Supporting ethical and lawful working practices.
- Acting in a manner consistent with the values and principles of this policy.

Managers and senior staff are expected to:

- Promote awareness of modern slavery risks.
- Encourage ethical working practices.
- Take concerns seriously.
- Escalate concerns appropriately.
- Support investigations where required.
- Monitor compliance with this policy where appropriate.

Overall responsibility for implementation, monitoring and review of this policy rests with the Directors of Theorise Ltd.

Day-to-day responsibility for implementation may be delegated to appropriate members of the management team.

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#### **5. Identifying Modern Slavery Risks**

Indicators of modern slavery may include, but are not limited to:

- Evidence of coercion, threats or intimidation.
- Restrictions on an individual's freedom of movement.
- Individuals appearing fearful, withdrawn or controlled by others.
- Lack of access to personal identification documents.
- Unusual working or living arrangements.
- Excessive working hours without appropriate compensation.
- Evidence that an individual is unable to leave employment freely.
- Signs of physical abuse, neglect or exploitation.
- Concerns raised by third parties regarding working practices.

The presence of one or more indicators does not necessarily mean that modern slavery is occurring, but concerns should always be taken seriously and reported appropriately.

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## 6. Reporting Concerns

Any individual who suspects that modern slavery, forced labour, servitude or human trafficking may be occurring should report their concerns immediately.

Concerns should be reported to:

**Dany Brunton**

Director

[dany@theorise ltd.com](mailto:dany@theorise ltd.com)

Reports should include as much relevant information as possible, including:

- Details of the concern.
- Dates and locations where relevant.
- Individuals involved where known.
- Any supporting information or evidence.

Where appropriate, concerns may also be reported directly to:

### **Modern Slavery and Exploitation Helpline**

08000 121 700

Website: <https://www.modernslaveryhelpline.org>

All concerns will be treated seriously and investigated appropriately.

Where there is an immediate risk of harm, emergency services should be contacted without delay.

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### **7. Protection for Individuals Raising Concerns**

Theorise Ltd encourages openness and transparency.

No individual will suffer detriment, victimisation or adverse treatment for raising a genuine concern in good faith, even where an investigation subsequently determines that no breach has occurred.

Theorise Ltd is committed to ensuring that individuals feel able to report concerns without fear of retaliation.

Deliberately false, malicious or vexatious allegations may be addressed separately under relevant company procedures.

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### **8. Due Diligence and Supply Chain Management**

Theorise Ltd seeks to ensure that appropriate due diligence is undertaken when engaging with suppliers, contractors and business partners.

Where appropriate, this may include:

- Reviewing supplier information.
- Assessing potential risks.
- Seeking assurances regarding compliance with relevant legislation.
- Monitoring ongoing relationships.
- Taking action where concerns are identified.

Theorise Ltd expects suppliers, contractors and business partners to operate lawfully, ethically and in accordance with applicable employment and human rights legislation.

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## 9. Training and Awareness

Theorise Ltd will seek to ensure that relevant individuals are aware of:

- Modern slavery risks.
- Indicators of exploitation.
- Reporting procedures.
- Responsibilities under this policy.

Training and awareness activities may be provided where appropriate.

The principles of this policy will also be communicated to suppliers, contractors and business partners where relevant.

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## 10. Policy Breaches

Failure to comply with this policy may result in:

- Informal action.
- Additional training.
- Formal investigation.
- Removal from assignments.
- Termination of engagement.
- Referral to relevant authorities where appropriate.

Theorise Ltd may terminate relationships with suppliers, contractors or business partners who breach this policy or who are found to have been involved in modern slavery, human trafficking or other forms of exploitation.

Where criminal activity is suspected, Theorise Ltd will cooperate fully with relevant authorities.

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## 11. Monitoring and Review

Theorise Ltd will review this policy periodically to ensure it remains effective, proportionate and compliant with legal requirements.

Monitoring may include:

- Review of reported concerns.
- Review of supplier relationships.
- Internal policy reviews.
- Feedback from staff and stakeholders.
- Legislative developments.

Where improvements are identified, appropriate action will be taken.

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## 12. Policy Review

Item	Details
Policy Owner	Dany Brunton
Approved By	Director
Version	Version 2.0
Last Reviewed	26/05/2026
Next Review Date	26/05/2027
Review Frequency	Annually