

# Modern Slavery and Human Trafficking Statement

for the Financial Year Ending 5th April  
2022

Seven Springs Education



Seven Springs  
Education

<b>Approved by:</b>	Willow Hewitt	<b>Date:</b> 02/11/2022
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<b>Last reviewed on:</b>	02/11/2022
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In accordance with the Modern Slavery Act 2015, Seven Springs Education has prepared an anti-slavery and anti-trafficking statement for the financial year ending 5th April 2022, setting out what steps it has taken to ensure that modern slavery is not taking place in its business or supply chains. The Seven Springs Education Modern Slavery and Human Trafficking Policy is also included in this document.

## **Legal Status and Activities**

Seven Springs Education provides online tutoring and educational services to individuals and schools in the UK. We are a private limited company registered under Nebula Education Ltd. In 2021, Seven Springs Education became an Approved Tuition Partner for the National Tutoring Programme (NTP) for the 2021/2022 period. The mission of the company is to increase access to affordable quality education services.

## **Policy**

Seven Springs Education has implemented a Modern Slavery and Human Trafficking Policy that reflects its commitment to preventing modern slavery and human trafficking. This policy outlines how the company complies with the Modern Slavery Act 2015 and states our procedures and steps taken to minimise the risk of modern slavery in our business and supply chains. This policy is reviewed by the Senior Leadership Team and published annually on our website. It is also approved by the company directors. It can be viewed below.

## **Activity In The Year Ending 5th April 2022**

Throughout the financial year ending 5th April 2022, Seven Springs Education has worked to ensure that the company and its supply chains uphold the commitment to prevent modern slavery and human trafficking. The standards for recruitment and pay set in the Modern Slavery and Human Trafficking Policy have, to the company's knowledge, been adhered to in all instances in this financial year. All relevant staff have undertaken modern slavery and human trafficking training and all of the company's suppliers have provided a modern slavery statement. The company did not receive any reports of concern about instances of modern slavery or human trafficking in the financial year ending 5th April 2022. The company will continue to raise awareness of modern slavery and human trafficking and of the need for proper due diligence and risk assessment processes in accordance with the Policy.

# Modern Slavery and Human Trafficking Policy

Seven Springs Education



<b>Approved by:</b>	Willow Hewitt	<b>Date:</b> 02/11/2022
<b>Last reviewed on:</b>	02/11/2022	
<b>Next review due by:</b>	02/11/2023	

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## 1. Aims

Seven Springs Education aims to ensure we comply with the Modern Slavery Act 2015. This policy states our procedures and steps taken to minimise the risk of modern slavery in our business and supply chains. This policy is reviewed by the Senior Leadership Team and published annually on our website.

This statement has been approved by the company directors on 26/10/2022 for the financial year ending 5th April 2023.

This statement has been signed off by Sze Yuk Hiu (Alan), the Managing Director on 26/10/2022.

## 2. About Seven Springs Education

Seven Springs Education provides online tutoring and educational services to individuals and schools in the UK. We are a private limited company registered under Nebula Education Ltd.

## 3. Our Staff

All staff who work for Seven Springs Education are thoroughly background checked during the recruitment process. As a part of the safer recruitment process, we complete identification checks on all prospective employees to ensure they have a right to work in the UK. We do not recruit or hire employees that do not have a right to work in the UK.

## 4. Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited as we produce most services and products internally. Where we work with a supplier, we ensure that they have a modern slavery statement or mechanisms in place for combatting and guarding against modern slavery.

## 5. Our steps to minimise the risk of modern slavery

In accordance with Section 54(4) of the Modern Slavery Act 2015, Seven Springs Education takes many steps to minimise the risk of modern slavery, forced labour and human trafficking in our business or supply chains. We have two senior members of staff who are responsible for preventing modern slavery: Joyce Wong (Senior Education Consultant) is responsible for training and policymaking and Willow Hewitt (Director of Operations) is responsible for approving policies and ensuring they are enforced.

Our steps to minimise risks are:

### 5.1 Recruitment

As a part of our safer recruitment process, all prospective employees are checked to confirm that they are legally entitled to work in the UK. Our recruitment panel are also aware of and follow guidance around modern slavery and human trafficking when recruiting, and are familiar with the process for reporting concerns. In addition, they receive training on modern slavery and human trafficking.

We only hire staff directly to ensure that all staff have been thoroughly vetted for risk of modern slavery and do not hire, or have, staff that are hired to work for us through an agency or third party.

## **5.2 Pay**

We minimise the risk of modern slavery by paying all staff the National Living Wage. We pay directly into a named bank account that matches the staff members' name on record unless requested otherwise. Where pay is paid into someone else's bank account, we will check for other signs of labour exploitation.

## **5.3 Working with suppliers**

Our staff who deal with procurement or sign contracts are given modern slavery and human trafficking training and are aware of the latest guidance to ensure that contracted suppliers uphold the same standards to combat modern slavery as Seven Springs Education.

When working with suppliers, we expect that they operate in a way that avoids labour exploitation and that they have a modern slavery statement available. Where a modern slavery statement is not available, we check that they have mechanisms in place for combatting and guarding against modern slavery. This may include having a clause in our contract that references modern slavery and human trafficking.

We work with Browns Books to source our textbooks, and their modern slavery statement can be viewed on their [website](#).

## **5.4 Training**

The Senior Leadership Team and other members of staff who deal with recruitment or procurement have undertaken modern slavery and human trafficking training to ensure that they can identify concerns and handle suspected cases. They are also kept up to date with modern slavery guidance from the government. Training is refreshed annually.

## **5.5 Monitoring**

We monitor the following key performance indicators to measure the effectiveness of the steps being taken:

- The percentage of relevant staff that have undertaken modern slavery and human trafficking training
- The percentage of suppliers that have provided a modern slavery statement

## **5.6 Students**

We take the safeguarding of students seriously and have in place a child protection and safeguarding policy to prevent safeguarding issues such as child sexual exploitation and human trafficking. Our staff are fully trained to deal with child protection and safeguarding issues and we have a Designated Safeguarding Lead (DSL) who works to support staff in keeping students safe.

## 5.7 Due diligence

Seven Springs Education ensures strict compliance checks are completed for all workers and employees by:

- verifying the identity of each worker/employee and their right to work before supply commences
- conducting a series of vetting and compliance checks including, obtaining enhanced DBS checks (with barred list), obtaining Rehabilitation of Offenders declaration, obtaining data release declaration, obtaining 10 year work history, obtaining employment references, completing registration forms, and carrying out in-person interviews
- providing channels through which workers/employees may voice concerns either through local reporting mechanisms or through the whistleblowing procedure

Seven Springs Education is committed to protecting employees when disclosing malpractice and ensures that all disclosures made in good faith are treated confidentially and without fear of retaliation.

## 6. Reporting concerns

We are committed to dealing with modern slavery and human trafficking concerns seriously. All staff are required to raise concerns to our Senior Leadership Team by contacting them directly at [slt@seven-springs.co.uk](mailto:slt@seven-springs.co.uk). Concerns can also be reported to the police on 101 or the Modern Slavery Helpline on 0800 0121 700 ([www.modernslaveryhelpline.org/](http://www.modernslaveryhelpline.org/)) if there is not an immediate risk of harm. In an emergency, concerns should be reported immediately to the police on 999.

## 7. Links with other policies

This policy links with our policies on:

- Whistle-blowing policy
- Equality, diversity and inclusion policy

You may view these on our [website](#).