



CENIT
COLLEGE

Cenit College UK

Modern Slavery

Policy

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Introduction

Slavery is illegal and a violation of human rights. Modern Slavery takes many forms including; human trafficking, forced labour, child labour, exploitation, being controlled or owned by an employer through mental or physical abuse or the threat of abuse, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain. The Modern Slavery Act (2015) seeks to eliminate acts of Modern Slavery.

Statement

The Cenit Group is committed to protecting and respecting human rights and have a zero-tolerance approach to slavery and human trafficking in all its forms. This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes the Cenit Group's slavery and human trafficking statement for the financial year ended 31st December 2023. It sets out the steps we have taken across our teaching and operational activities in relation to slavery and human trafficking in our supply chains and within our own organisation.

We are committed to making sure that all employees, not just those engaged directly by us; are treated with respect and dignity, are working under their own free will, have working conditions are safe and hygienic, are working hours that are not excessive and that individuals are properly compensated for their effort.

All members of staff have a responsibility for the successful prevention of slavery and human trafficking with the Senior Leadership Team taking responsibility for overall compliance. The College will provide appropriate training and processes to effectively implement its stance on modern slavery and human trafficking.

The College is not aware of any modern slavery activities within its current operation or supply chain but will act to ensure appropriate legislation is complied with, should any be discovered. The College will periodically review the effectiveness of the policies, training and other measures taken to combat modern slavery and human trafficking.

Organisational Structure

The Cenit Group is a training and education provider registered in the UK and Ireland. It employs over 100 permanent staff. The core business of the Cenit Group is teaching a large adult learner population via online and blended learning modalities.

Scope of Policy

This policy applies to all persons working for Cenit Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Due Diligence Processes

In our efforts to identify and mitigate the risks of modern slavery within our operational activities, the Cenit Group will adopt a due diligence process that is proportionate to any risks that we identify. We will monitor these processes and review them periodically.

Cenit Group has a system 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.
- Undertake appropriate pre-employment checks on directly employed colleagues and require agencies to provide assurance that pre-employment clearance has been obtained for associates.
- Implement a range of controls to protect colleagues from poor treatment and/or exploitation, which comply with all respective laws and regulations.
- These include provision of fair pay rates, fair Terms of Conditions of employment and access to training and development opportunities.
- Require all suppliers to comply with the provisions of the UK Modern Slavery Act (2015), through affirming commitment to the Cenit Groups principles of ethical business. All of which set out our commitment to ensuring no modern slavery or human trafficking related to our business.
- Where possible, build long-standing relationships with suppliers.

Supply Chains

The Board of Directors is responsible for compliance with relevant UK and EU tender rules and regulations.

When procuring any types of goods or services, as part of our corporate social responsibility, the Cenit Group requires all potential third-party suppliers to affirm their commitment to the principles of ethical business conduct that guide the Cenit Group.

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the Cenit Groups own policies and procedures, will be removed from the preferred list of suppliers and will not be considered for future supply to the organisation unless they can demonstrate that these compliance requirements are met.

In terms of future steps, the Cenit Group will review the viability of introducing other due diligence processes on an ongoing basis for monitoring and managing identified risks, including risks associated with particular countries and products.

Communication and awareness of this policy

This policy is made available to all staff, stakeholders and the general public by publication on our website.

Information for Learners

We share information on modern slavery and human trafficking within the learner handbook, and our learner VLE Safeguarding module

Training

We seek to raise awareness of the risks of modern slavery amongst our staff through various training opportunities. All employees of the Cenit Group receive training on modern slavery and human trafficking. This is achieved as follows;

- As part of the induction training for new staff
- An annual refresher programme for existing Cenit Group staff
- Publication on our website and internal SharePoint site of this statement.

Recruitment Practices

All staff (full time or temporary) recruited indirectly by Cenit Group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the Cenit Group conducts checks on such agencies before they are approved.

Through its recruitment processes, the Cenit Group ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been carried out.

Policies

This modern slavery and human trafficking policy is consequential with the following College workplace policies and procedures that are in place:

- Grievance and Whistleblowing policies – these policies allow staff, learners, and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
- Recruitment & Induction policy – this policy ensures that the Cenit Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.
- Anti-bribery policy
- Equality and Diversity Policy

Breaches of the Policy

All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed above. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Risk assessment and management

The College is committed to taking the following steps to reduce all risks which have the potential to tie the University to modern slavery:

- A review of procurement procedures, with revised procedures which will help identify and assess any potential modern slavery risks when considering new providers.
- A review of current supply chains, with action taken to remove suppliers who cannot comply with University's policies and procedures
- . • A review of all key Human Resources policies and documentation to ensure ethical recruitment and inductions take place.
- Provision of adequate training to all staff designed to promote awareness of the Modern Slavery and Human Trafficking Policy.

Performance Indicators

We use the following key performance indicators to measure how effective we have been to raise awareness and ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Staff training records
- Verification by suppliers that they adhere to the registration (usually written).
- Review of third-party suppliers of relevant goods and services supply chains.

This statement and policy has been approved by the Cenit Group's Board of Directors and will be reviewed annually.

Signed



Vaeni MacDonnell

Managing Director

26th July 2024

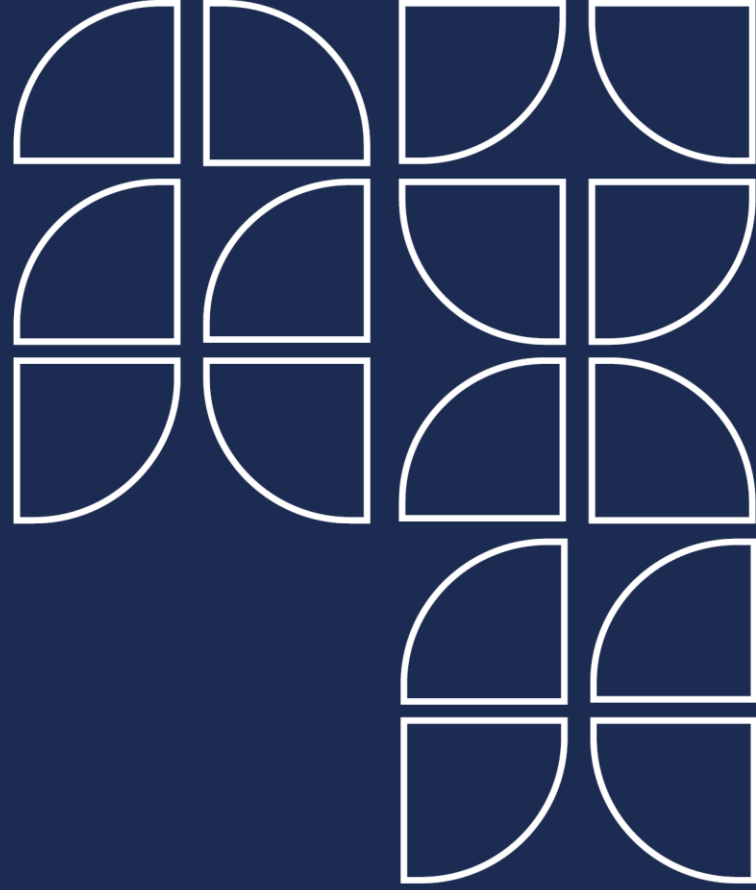
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Next Review: June 2026

Version Control

Version	Date	Description	Originator	Approved by
New Policy Version	31/12/2021	New Policy	Celia Robotham	BOD
V1.2	26/07/2024	Update	Vaeni MacDonnell	BOD
V 1.3	21/09/2026	Formatting alignment with branding (cover, font, footer)	Renata Sikorska	BOD



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