

Anti-Slavery & Human Trafficking Policy Statement

1. Introduction

11 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes London Care Homes Ltd t/a The Learning Station's slavery and human trafficking statement for the financial year ending 31 July 2017

12 London Care Homes Ltd t/a The Learning Station is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Company is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

2. Due Diligence processes

21 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of Company services, London Care Homes Ltd t/a The Learning Station will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

22 London Care Homes Ltd t/a The Learning Station has in place systems 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.
- Protect whistle blowers.

23 London Care Homes Ltd t/a The Learning Station identifies the following as the principal areas of potential risk:

- Supply Chains for goods and services - particularly IT equipment and uniforms; outsourced cleaning and security services
- Recruitment agencies for temporary staff

3. Supplychains

31 In its supply chains, London Care Homes Ltd t/a The Learning Station has identified the following business areas as carrying material risks of modern slavery occurring:

- IT equipment
- Clothing and uniforms
- Outsourced cleaning
- Outsourced security services

- 32 When tendering any types of goods or services, London Care Homes Ltd t/a The Learning Station requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection process, including through contracting with suppliers from approved procurement frameworks.
- 33 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the Company requires any supplier to evidence that that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- 34 Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with London Care Homes Ltd t/a The Learning Station that does not comply with the Modern Slavery Act 2015, or London Care Homes Ltd t/a The Learning Station' own policies and procedures, will be removed from London Care Homes Ltd t/a The Learning Station list of suppliers and will not be considered for future supply to the Company unless they can demonstrate that these compliance requirements are met.
- 35 In terms of future steps, London Care Homes Ltd t/a The Learning Station will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products

4. Training

- 4.1 To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff responsible for recruitment, procurement and contract management. We also require our business partners to provide training to their staff and suppliers and providers.

5. Recruitment practices

- 5.1 Temporary staff and staff recruited indirectly by London Care Homes Ltd t/a The Learning Station are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, London Care Homes Ltd t/a The Learning Station conducts checks on such agencies before they are approved.
- 5.2 Through its recruitment processes, London Care Homes Ltd t/a The Learning Station ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

6. Company policies

- 6.1 London Care Homes Ltd t/a The Learning Station already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Company business. London Care Homes Ltd t/a The Learning Station operates the following policies:

Grievance and Whistleblowing policies - these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Employee Code of Conduct - this code sets out the actions and behaviour expected of them whilst employed by London Care Homes Ltd t/a The Learning Station. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain

Anti-bribery and corruption policy - London Care Homes Ltd t/a The Learning Station is committed to the highest standards of ethical conduct and integrity in its business activities. London Care Homes Ltd t/a The Learning Station will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf

Procurement policy - this policy reflects London Care Homes Ltd t/a The Learning Station's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

Recruitment policy- this policy ensures that London Care Homes Ltd t/a The Learning Station follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

7. Performance indicators

7.1 Where London Care Homes Ltd t/a The Learning Station has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Company will consider setting and reviewing KPIs in the following contexts:

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
- assessment of third party suppliers of relevant goods and services and their supply chains

7.2 This statement will be made available to all staff members, stakeholders and the general public. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

7.3 Having assessed the training needs for all staff operating in the company, London Care Homes Ltd t/a The Learning Station will look at devising and implementing training and awareness- raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

Document Review Plans

This document is subject to a scheduled annual review. Updates shall be made in accordance with business requirements and changes.