



Modern Slavery and Human Trafficking

Policy 2025 - 2026

Introduction

Bay Learning Academy CIC is committed to upholding the highest ethical standards in all our activities, ensuring that modern slavery or human trafficking does not occur within our organisation or any of our supply chains. This policy outlines our approach and the steps taken to identify, prevent, and address any risks related to modern slavery.

Organisational Structure and Supply Chains

Bay Learning Academy CIC is an educational provider offering alternative education pathways. We collaborate closely with local authorities, schools, families, and community partners. Our supply chains primarily involve educational resources, services, administrative support, and facilities maintenance sourced from reputable, vetted suppliers.

Policy Statement

We have zero tolerance towards slavery and human trafficking. Our commitment extends across all operations and relationships, ensuring transparency and ethical accountability at every level.

Due Diligence Processes

Our due diligence processes include:

- Regular risk assessments of our supply chains and partners.
- Clear contractual requirements mandating compliance with anti-slavery and trafficking legislation.
- Robust vendor vetting, selection, and review processes.
- Active engagement with partners to ensure alignment with our ethical standards.



Risk Assessment and Management

We acknowledge potential risks in areas including facility maintenance, procurement of educational materials, and outsourced services. To manage these risks:

- Regular audits and reviews are conducted on our suppliers and contractors.
- Enhanced scrutiny is applied when engaging new suppliers or services.
- Any identified risks are immediately addressed with corrective measures.

Measuring Effectiveness

Our performance indicators include:

- Regular review of suppliers and compliance records.
- Number of issues or concerns identified and effectively resolved.
- Results from audits and inspections.

Training and Capacity Building

Bay Learning Academy CIC ensures all staff are fully informed and trained regarding modern slavery and human trafficking. This includes:

- Annual mandatory training sessions.
- Updates on identifying signs of modern slavery.
- Clear internal reporting procedures to address concerns effectively.

Review and Continuous Improvement

This policy is reviewed annually, with updates communicated to all stakeholders to ensure ongoing compliance and effectiveness.

Approval

This policy is approved and endorsed by the Board of Directors of Bay Learning Academy CIC.