

Modern Slavery Policy

Master Class Education Ltd.

Financial Year: 2025–2026

Published in accordance with Section 54 of the Modern Slavery Act 2015

Introduction

This statement is made as part of Master Class Education Ltd.’s commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (“the Act”). It outlines our business operations, the policies and processes we have in place to minimise the risk of modern slavery, the steps we take to monitor and manage potential risks, and the training we provide to our staff.

What Is Modern Slavery?

Modern slavery is a grave violation of human rights affecting millions globally. It encompasses exploitative practices such as:

- Forced labour
- Human trafficking
- Forced marriages
- Debt bondage
- Domestic servitude

Victims are often coerced through threats, deception, abuse of power, or violence. Everyone has a responsibility to help eliminate this crime by recognising indicators, taking appropriate action, and preventing further harm.

1.0 Our Business

Master Class Education Ltd. is a limited company operating in the recruitment sector, specifically supplying temporary workers to the education sector. We are an independent business committed to ethical practices.

1.1 Who We Work With

- All hirers and work-seekers are known and identified by our staff.
- We do not use intermediaries to supply work-seekers.
- All temporary workers are vetted and verified internally.

1.2 Other Relationships

We collaborate with the following organisations to uphold industry standards:

- Recruitment and Employment Confederation (REC) – www.rec.uk.com
- Crown Commercial Services (CCS)

2.0 Our Policies

Master Class Education Ltd. maintains a dedicated Modern Slavery Policy and integrates ethical standards across the following policies:

- Corporate Social Responsibility
- Whistleblowing Policy
- Operational Transparency

2.1 Policy Development and Review

Policies are developed by our senior leadership team, informed by HR professionals, legal advisors, and industry best practices. Reviews are conducted regularly or as needed to reflect changes in legislation or business operations.

3.0 Our Processes for Managing Risk

We uphold a zero-tolerance approach to modern slavery and human trafficking. While we have not identified significant risks within our supply chain, we remain vigilant and proactive.

Risk Mitigation Measures

- Conducting spot-checks on suppliers in response to complaints
- Requiring suppliers to address modern slavery in their own policies
- Collaborating with industry bodies to improve transparency
- Restricting contract sign-off to senior staff in high-risk areas
- Encouraging staff to report concerns without fear
- Promoting fair treatment and inclusivity in the workplace
- Enforcing rigorous recruitment practices aligned with employment law

4.0 Our Performance

We monitor our effectiveness through the following key performance indicators:

- Staff training levels on modern slavery awareness
- Compliance and transparency with candidates and clients

We ensure our performance metrics do not inadvertently pressure suppliers or increase risk.

5.0 Our Training

All staff receive role-appropriate training and support. Specifically:

- Awareness training on modern slavery and human trafficking
- Encouragement to report concerns to management
- Regular refreshers to maintain vigilance and understanding

For further information, please contact: ellie@mcegroup.co.uk

6.0 Spotting Signs of Modern Slavery

Master Class Education Ltd. recognises that awareness is key to identifying and preventing modern slavery. All staff are trained to recognise common indicators that may suggest someone is at risk. These signs may include:

- Physical appearance: Signs of abuse, malnourishment, or untreated injuries
- Behavioural indicators: Fearful, anxious, submissive, or unable to speak freely
- Living conditions: Poor hygiene, overcrowded accommodation, or lack of personal possessions
- Working conditions: Long hours without breaks, low or no pay, or restricted movement
- Documentation issues: Lack of official identification, or someone else holding their documents
- Control and coercion: Evidence of threats, debt bondage, or dependency on others for basic needs

Staff are encouraged to remain vigilant and to trust their instincts. If something seems unusual or concerning, it should be reported.

7.0 Reporting Concerns

Master Class Education Ltd. is committed to creating a safe and transparent environment where concerns can be raised without fear of retaliation. If a member of staff suspects that someone may be a victim of modern slavery, they should:

1. Report the concern immediately to their line manager or a designated safeguarding officer.
2. Document the concern clearly and factually, including dates, observations, and any relevant details.

3. Avoid direct confrontation with suspected victims or perpetrators unless trained to do so.
4. Maintain confidentiality and handle all reports sensitively and professionally.

Concerns can also be raised anonymously through our Whistleblowing Policy. All reports will be investigated promptly and thoroughly, and appropriate action will be taken in line with our safeguarding and legal obligations.

8.0 Investigating Concerns of Modern Slavery

Master Class Education Ltd. is committed to thoroughly investigating any concerns or allegations related to modern slavery. Our process is designed to be fair, confidential, and compliant with legal obligations.

Investigation Procedure:

- **Initial Assessment:** Upon receiving a concern, the designated safeguarding officer or senior manager will conduct a preliminary review to determine the nature and urgency of the issue.
- **Evidence Gathering:** We will collect relevant information, including interviews with involved parties, documentation, and any supporting materials.
- **Engagement with Authorities:** If the concern indicates a potential criminal offence or serious risk, we will escalate the matter to the appropriate external authorities, including law enforcement or safeguarding bodies.
- **Internal Review:** We will assess whether any internal policies or procedures contributed to the issue and take corrective action where necessary.
- **Outcome and Follow-Up:** Findings will be documented, and appropriate actions will be taken, including disciplinary measures, supplier termination, or policy updates. We will follow up to ensure resolution and monitor for recurrence.

All investigations are handled with discretion and sensitivity, and we strive to act promptly and responsibly.

9.0 Protection for Those Who Raise Concerns

Master Class Education Ltd. is committed to fostering a culture of openness and integrity. We ensure that individuals who raise concerns about modern slavery are protected from retaliation or disadvantage.

Our Commitment Includes:

- **Confidentiality:** All reports are treated with strict confidentiality, and identities are protected wherever possible.
- **Non-Retaliation:** We prohibit any form of retaliation against individuals who report concerns in good faith, regardless of the outcome of the investigation.
- **Support:** Staff who raise concerns will be offered appropriate support, including access to HR, safeguarding officers, or external resources if needed.
- **Whistleblowing Assurance:** Our Whistleblowing Policy provides a formal mechanism for anonymous reporting and guarantees protection under UK employment law.

We encourage all staff, suppliers, and stakeholders to speak up if they suspect exploitation or unethical practices. Their vigilance is vital to maintaining a safe and fair working environment.

Commitment to Review

Master Class Education Ltd. takes full responsibility for this statement and its objectives. We will review and update it annually or as required under the Modern Slavery Act 2015.

