

LEARNING WORKS' LWP16: ANTI-SLAVERY and HUMAN TRAFFICKING POLICY

TYPE: POLICY

SUBJECT: ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY
REFERENCE: LWP16

DATE OF POLICY:
1st October 2020

LAST REVIEWED:
1st Oct 2021

APPROVED BY:
The Board of Directors

1. The Policy

i. As one of the companies within the Vassallo Group, Learning Works disassociates itself from any activity/business which is directly or indirectly related or which might in any circumstances lead to modern slavery.

ii. We consider modern slavery in all its forms as a fundamental violation of human rights which deprives the person from his freedom and leads to exploitation. Mainly this includes:

- Slavery;
- Servitude;
- Forced and compulsory labour;
- Human trafficking.

iii. As a company we strive to act immediately to address any issue related to modern slavery, adopting a zero-tolerance approach by:

- Acting ethically and with integrity at all times;
- Conducting our business within a legal framework;
- Setting an effective system to continuously control that no abuse takes place.

iv. To eradicate this inhuman activity, we continuously check that we do business with partners sharing the same values and that they promote an Anti-Slavery and Human Trafficking approach.

v. This policy binds all employees, in all levels, who work at Learning Works. It also expects that all students share and promote the same values.

vi. This policy is communicated to all employees and to all students and may be updated from time to time to reflect the latest developments.

2. Responsibility

- i. The Directors within the company have the obligation to ensure that all the employees at all levels, third parties doing business with the company and students following courses at the Institution comply and share the values of this policy.
- ii. Learning Works obliges lecturers to promote the values expressed in this Policy during all their activities, especially during lectures and, furthermore, obliges them to take necessary action when they notice any activity which is related to or might lead to the violation of human rights with regard to Anti-Slavery and human trafficking.
- iii. This Policy obliges students to act responsibly towards their fellow colleagues, act as guardians to each other and report immediately to the proper authorities any form of Anti-Slavery and Human trafficking suspects. This will help to prevent any illegal violation from taking place immediately.

3. Compliance

- i.. All those working with Learning Works are obliged to prevent, detect and report immediately to their next in line responsible person, any form of modern slavery. Furthermore, they are obliged to avoid doing any form of activity with third parties who do not share the values expressed in this Policy.
- ii. All employees or students are expected to report immediately to their next in line responsible person any form of activity or any suspect of activity which might lead to modern slavery.
- iii. Learning Works will offer learners full protection and support to report immediately any form of modern slavery.
- iv. If disclosure will affect the rights or wellbeing of other humans with respect to modern slavery, the whistle blower is obliged to report immediately, in confidence, to the respective responsible next in line person.
- viii. This Policy aims to protect not only those who might be a victim of modern human slavery but also those who have the courage to take the necessary actions to eradicate it. Therefore, if you feel that in some way or another you have been mistreated after reporting in good faith any action/activity which might lead to modern trafficking, you are strongly encouraged to report this behaviour to your next in line responsible person or to follow our Company Student Complaints, Appeals & Grievances Policy and Procedure.

4. Communication & Awareness

- i. This Policy is communicated to all employees within Learning Works and all the students who register with us. It is not part of their contract; however, they are made aware of it when presented with the Institution's policies.

ii. We share the values expressed within this Policy with our business partners and make them aware that we do not tolerate any violation with regard to modern slavery.

5. Breaches

i. Any breaches of this Policy would lead our employees to be prevented from carrying out any duties within the company. In such cases, students would need to terminate their course of studies.

ii. The company also exercises the right to withhold or stop any business or activity with third parties who do not share the values expressed in this policy.

Charlo Bonnici
CEO