

# Modern Slavery Policy

Metadata Training

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## 1. INTRODUCTION

This statement is made on behalf of Metadata with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy to be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

## 2. MODERN SLAVERY STATEMENT

- I. Metadata is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.
- II. We are committed to ensuring that there is no slavery or human trafficking in our organisation and wider supply chains. This policy reflects our commitment to acting ethically, with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## 3. ORGANISATIONAL STRUCTURE

We are a training company delivery training in Business Analysis and Project Management.

## 4. OUR SUPPLY CHAINS

1. Metadata has several suppliers for various parts of the organisation. These include, but not limited to:
  - Business partners
  - Apprentice employers
  - External contractors including advisors, cleaners, builders, freelancers and consultants
  - Guest speakers and lecturers/Tutors
  - Printing of Metadata promotional materials
  - Advertising, including digital and print
  - Merchandise
  - Photography
  - Graphic design

2. Metadata operate a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.
3. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:
  - They have taken steps to eradicate modern slavery within their business.
  - They hold their own suppliers to account over modern slavery.
  - (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
  - (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
  - We may terminate the contract at any time should any instances of modern slavery come to light.

## 5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- I. Metadata is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our suppliers, contractors and business partners, and this is inferred through their agreement to follow Metadata policies. We will expect our suppliers to hold their own suppliers to the same high standards.
- II. All employees and persons employed within Metadata are asked to familiarise themselves with Metadata policy at the start of their employment or association and are contractually obligated to adhere to Metadata's policies.
- III. We are satisfied from our own due diligence measures that there is no evidence of any act of modern-day slavery or human trafficking within our own organisation.

## 5.1 Preventative measures

Metadata will take the following steps to further the goals of the Modern Slavery Act 2015:

- I. Seek to conduct risk assessments to determine which parts of Metadata and its suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- II. Engaging with our suppliers to convey to them Metadata's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses.
- III. Seek to introduce additional pre-screening measures for all suppliers.
- IV. Publishing this statement and policy on Metadata's website to clearly display Metadata's support to end modern slavery.

## 5.2 Due diligence for our supply chains

- I. Metadata will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking. Metadata has a zero-tolerance policy on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.
- II. Metadata's supplier approval process incorporates a review of the controls undertaken by Metadata's potential suppliers.
- III. The vast majority of Metadata's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

## 6. REPORTING MODERN SLAVERY

- I. This policy should be read in conjunction with Metadata's [whistleblowing and safeguarding policies](#) both of which are accessible to all staff. The whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation.
- II. Any suspected instance of modern slavery or human trafficking within Metadata or its suppliers must be reported to one of Metadata's Designated Safeguarding Officers (DSOs), who will investigate and advise the appropriate people and external organisations of any further actions.

- III. Further information regarding the reporting procedures can be found in Metadata's Safeguarding policy. The aforementioned policies apply to all employees and may be found in the central digital document storage area.

## 7. RESPONSIBILITIES

- I. Ultimate responsibility for the prevention of modern slavery within Metadata rests with our compliance officer. Metadata's compliance officer has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.
- II. Compliance officer is responsible for ensuring all staff and Tutors understand and comply with this policy.

## 8. COMMUNICATION AND AWARENESS

This policy is displayed on Metadata's Google-Drive system, the policy location is conveyed to all staff members at their induction recruitment.

## 9. REVIEW

The Modern Slavery Statement and Policy will be reviewed annually by Metadata's compliance officer in accordance with clause 6 of the Modern Slavery Act 2015.

### Training

We regularly conduct training for our team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Approval for this statement**

This statement was approved by Company Director on 22/06/21

Name Mike Goodland

A handwritten signature in black ink, appearing to read 'M. C. Goodland', is written over a light blue rectangular background.

Signature