

Roman Education & Careers Ltd

Modern Slavery & Human Trafficking Statement and Policy

Document owner	Director / Head of Centre
Approved by	Giedre Beige, Director
Organisation	Roman Education & Careers Ltd (trading as Roman Training and Jobs)
Company number	15920257
Registered office	Cardinal Point, Park Road, Rickmansworth, Hertfordshire, WD3 1RE
Version and status	Version 3.0 - Director Approved
Review date	31 January 2027 or earlier if legislation, funding rules, contract requirements or risk profile changes

Note: Roman Education & Careers Ltd is below the statutory turnover threshold for mandatory section 54 publication. Roman nevertheless maintains and publishes this statement voluntarily to demonstrate good governance, public funding assurance, ethical labour standards and supply chain transparency.

Director statement

Roman Education & Careers Ltd has a zero tolerance approach to modern slavery, human trafficking, forced labour, servitude, child labour, debt bondage and all forms of labour exploitation. We are committed to acting ethically and with integrity in our organisation, recruitment, learner facing delivery, procurement and supply chain relationships. We recognise that education, skills, employability and subcontracted public funding delivery involve contact with people who may be vulnerable to exploitation. For that reason, modern slavery risk is managed alongside safeguarding, safer recruitment, right to work, whistleblowing, equality, health and safety, data protection, quality assurance and subcontract compliance controls.

This statement sets out the steps Roman takes, and will continue to strengthen during 2026-2027, to identify, prevent, mitigate and respond to modern slavery risk in our business and supply chains. It is intended to meet the expectations of the Modern Slavery Act 2015, Government transparency in supply chains guidance, public sector requirements and subcontracting assurance.

1. Purpose and legal framework

The purpose of this document is to set out Roman's policy, governance, due diligence, reporting and continuous improvement arrangements for preventing modern slavery and human trafficking. It applies to Roman's own workforce, associates, contractors, suppliers, employer partners, training venues, recruitment activity, adult learning delivery and any other organisation or individual acting on Roman's behalf.

Section 54 of the Modern Slavery Act 2015 requires certain larger commercial organisations to publish an annual modern slavery statement. Even where an organisation is not legally required to publish, Roman recognises that public sector commissioners, prime contractors, colleges and funding bodies increasingly expect smaller delivery partners to evidence proportionate modern slavery controls. Roman therefore adopts a voluntary, proportionate statement and policy approach aligned to recognised good practice.

2. Our business, structure and supply chains

Roman Education & Careers Ltd is a private limited company delivering adult education, skills, employability, employment outcomes and training provision. Roman works with adults and learners who may require

confidence building, employability support, vocational training, progression planning, learner support, employer engagement and access to further learning or work.

Roman's core delivery model may include direct employees, qualified tutors and assessors, IQA specialists, learner support personnel, employer engagement support, outreach/community venues, technology and operational suppliers, awarding or curriculum related bodies, professional advisers and other service suppliers. Roman does not permit unauthorised onward subcontracting under funded learning arrangements and will comply with any commissioner or college requirements restricting or prohibiting third party delivery.

3. Policy commitments

- Operate a zero tolerance approach to modern slavery and human trafficking.
- Ensure recruitment is lawful, fair and free from coercion, recruitment fees or document retention.
- Complete right to work checks and maintain appropriate employment records.
- Use proportionate due diligence for suppliers, venues, delivery partners and employer facing relationships.
- Train staff to recognise and escalate concerns, including risks affecting adult learners and vulnerable service users.
- Protect whistleblowers and treat concerns sensitively and confidentially.
- Investigate concerns promptly and escalate to safeguarding leads, statutory agencies or law enforcement where appropriate.
- Review effectiveness through quality assurance, audit, contract monitoring and annual policy review.

4. Definitions and indicators

Modern slavery is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. It may also include debt bondage, criminal exploitation, child labour, domestic servitude, labour exploitation, sexual exploitation and coercive control linked to work or services.

- A person appears controlled by someone else, is accompanied by a person who speaks for them, or is afraid to speak freely.
- A person lacks access to their own documents, bank account, phone or personal possessions.
- There are signs of coercion, threats, intimidation, debt bondage, unexplained fear, injury, neglect or isolation.
- A person is working excessive hours, not receiving wages directly, living in poor conditions, or unable to leave a job or accommodation.
- A learner discloses unsafe work, coercive relationships, forced criminal activity, threats to family members, or pressure linked to debt, housing or immigration status.

5. Risk assessment and risk areas

Roman assesses modern slavery risk using a proportionate risk based approach. In adult skills and employability delivery, the main risk is not a complex global goods supply chain; it is the possibility that vulnerable learners, staff, contractors or workers in local supply chains may be subject to exploitation and that warning signs may be missed. Roman therefore links modern slavery control to safeguarding, enrolment, learner support, employer engagement, venue management and supplier due diligence.

Risk area	Potential risk	Controls	Risk level after controls
Recruitment and employment	Unlawful working, coercion, unpaid work, recruitment fees, document retention	Right to work checks, contracts, payroll records, no worker paid recruitment fees, fair employment practices, HR oversight	Low
Associates/contractors	Poor labour standards or lack of clarity over employment status	Supplier onboarding, contractual expectations, identity/qualification checks, safeguarding/DBS checks where required	Low-Medium
Venues and local suppliers	Insufficient ethical assurance or safeguarding suitability	Venue risk assessment, accessibility and H&S checks, booking records, public/community venue preference, escalation route	Low-Medium
Employer engagement/progression	Participants referred into unsuitable or exploitative work	Employer due diligence proportionate to risk, vacancy suitability checks, learner feedback, post placement/in-work follow up, escalation if concerns arise	Medium
Vulnerable adult learners	Learners affected by exploitation, coercion, debt, unsafe work, housing pressure or domestic servitude	Safeguarding induction, tutor awareness, learner support, confidential reporting, DSL escalation, external referral pathways	Medium

6. Governance, roles and responsibilities

Role	Responsibility	Evidence
Director / Head of Centre	Approves policy, ensures resources, receives escalations and signs the annual statement.	Signed statement; board/management minutes; annual review log
Quality Assurance Team	Monitors compliance through QA meetings, internal audit, learner voice, supplier/venue checks and improvement actions.	QAT minutes; audit schedule; QIP/CIP actions
Designated Safeguarding Lead / nominated safeguarding contact	Receives learner or staff concerns, assesses risk and escalates to statutory agencies where required.	Safeguarding records; referral logs; training records
HR / Recruitment lead	Ensures fair recruitment, right to work checks, contracts and no worker paid fees.	RTW checks; contracts; DBS checks where applicable
All staff, tutors, assessors and contractors	Recognise indicators, follow code of conduct, report concerns immediately and comply with policy.	Induction records; CPD/training records; signed handbook/policy acceptance

7. Supplier, venue and partner due diligence

Roman applies proportionate due diligence before and during engagement with suppliers, venues, associates, employer partners and service providers. The level of checking is risk based and considers the nature of the service, level of learner contact, labour intensity, geographic and sector risk, use of subcontractors, workforce profile and contractual value.

- Supplier/partner onboarding questions covering modern slavery, ethical labour standards, right to work, use of labour agencies and subcontracting.

- Contractual expectations requiring compliance with law, ethical working practices, cooperation with enquiries and immediate notification of concerns.
- Enhanced checks for higher risk relationships, including request for policies, declarations, insurance, safeguarding arrangements, DBS evidence where applicable and evidence of lawful labour practices.
- Venue risk assessments covering safeguarding suitability, accessibility, health and safety, learner privacy, supervision and reporting arrangements.
- Termination, suspension or corrective action where suppliers, venues or partners fail to meet Roman's expectations.

8. Recruitment and employment controls

All staff and contractors engaged for delivery are checked for identity, role suitability, qualifications and right to work before starting work.

- Roman does not charge recruitment fees to workers, learners or candidates for access to employment or training opportunities.
- Roman does not retain original identity documents except where temporary inspection is required for lawful checks; documents are returned promptly and securely.
- Staff involved in regulated or learner facing activity are subject to safeguarding checks, including DBS where required by role, contract or risk assessment.
- Concerns about coercion, exploitation, unsafe working conditions or unlawful work are escalated through HR, safeguarding and whistleblowing routes.

9. Learner facing safeguarding and delivery controls

Roman recognises that adult learners may be at risk of exploitation, particularly where they face unemployment, insecure housing, low income, language barriers, low confidence, debt, family pressure, coercive relationships, immigration related anxieties, disability, health conditions or limited knowledge of workplace rights. Roman will therefore manage modern slavery awareness as part of learner safeguarding and employability support.

- Modern slavery indicators are included within safeguarding awareness for delivery staff and learner facing personnel.
- Learners are given clear routes to raise concerns confidentially, including through tutors, learner support staff and safeguarding contacts.
- Employer facing progression routes are reviewed to ensure they are suitable, lawful and do not expose learners to exploitative work.
- Where a learner discloses or is suspected to be at risk, staff follow safeguarding escalation procedures and do not investigate beyond their role or place the learner at further risk.
- Emergency concerns are escalated to the police on 999; non-emergency concerns are managed through safeguarding, statutory referral pathways and specialist helplines where appropriate.

10. Training and awareness

Modern slavery awareness forms part of Roman's wider compliance, safeguarding, Prevent, equality, whistleblowing and ethical conduct arrangements. During 2026-2027 Roman will strengthen evidence by maintaining a training matrix showing completion dates, staff covered, refresher requirements and any role specific training for HR, procurement, recruitment, employer engagement and learner facing staff.

Training group	Content	Frequency	Evidence
All staff and tutors	Modern slavery indicators, reporting, whistleblowing, safeguarding links, learner vulnerabilities	Induction and annual refresher	Training matrix; policy acceptance
HR/recruitment	Right to work, fair recruitment, no recruitment fees, document handling, agency checks	Induction and annual update	HR files; RTW audit
Procurement/operations	Supplier due diligence, venue checks, contractual clauses, risk rating	Annual update	Supplier records; audit trail
Employer engagement staff	Suitable employer checks, safe work indicators, learner feedback, escalation	Annual update and contract specific briefing	Employer logs; progression review notes

11. Reporting, escalation and whistleblowing

Any person may raise a concern about exploitation, modern slavery, forced labour or human trafficking connected to Roman's business, supply chain or learner delivery. Concerns may be raised through the following routes:

- Email: reportit@romantrainingandjobs.co.uk
- Telephone / whistleblowing contact: 020 7060 4407
- Line manager, tutor, learner support contact, Designated Safeguarding Lead or Quality Assurance Team member
- Modern Slavery Helpline: 08000 121 700
- Emergency: call 999 if there is immediate danger or a crime in progress

Roman will handle concerns sensitively, protect confidentiality as far as possible, prohibit victimisation or retaliation, and escalate appropriately. Staff must not confront suspected perpetrators or conduct informal investigations where this could increase risk to the person affected.

12. Investigation, remediation and enforcement

- Record the concern and immediate risk assessment through safeguarding/quality routes.
- Take urgent steps to protect the affected person where safe and appropriate.
- Escalate to the Director, safeguarding lead, statutory agencies, law enforcement or specialist helplines depending on risk.
- Suspend, investigate, audit or terminate supplier/partner relationships where concerns are substantiated or cooperation is inadequate.
- Review lessons learned, update risk controls and add actions to the Continuous Improvement Plan / Quality Improvement Plan.

13. Monitoring effectiveness and KPIs

Roman will monitor the effectiveness of this policy through governance, audit, quality assurance and contract review. The following indicators will be reviewed at least annually and, for funded subcontracted provision, through contract management meetings where required.

Measure	Target 2026-2027	Frequency	Owner
Modern slavery policy/statement reviewed and approved	100% by review date	Annual	Director / QAT
Staff modern slavery/safeguarding	100% relevant staff	Induction and annual	QAT / HR

awareness completion			
Right to work records completed before work starts	100%	At appointment; audit termly	HR
DBS checks completed before relevant delivery starts	100% role required staff	At appointment; audit termly	HR / Safeguarding
Supplier/venue due diligence completed before use	100% relevant suppliers/venues	Before use; reviewed annually	Operations / QAT
Modern slavery concerns logged and escalated within procedure timescales	100%	As required; monthly review by exception	Safeguarding / QAT
Learner/employer feedback reviewed for exploitation or unsuitable work concerns	100% reviewed	Monthly / cohort review	Delivery Lead
Improvement actions closed by due date	90%+ or escalated	Monthly	QAT / Director

14. Publication, review and approval

This statement should be approved by a Director before publication. Roman should publish the current approved statement on its website and add a clear link from an appropriate footer, policies or compliance page. The statement will be reviewed annually or earlier if legislation, contract requirements, supply chain arrangements, delivery model, funding rules or risk profile changes.

Name	Giedre Beige
Position	Director
Date Approved	31/01/2026