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Modern Slavery and Human Trafficking Policy

Effective Date: 20th March 2025

Approved by: Ayshe Sivri

Version: 1.0

1. Purpose

New Alternative Path ("the Consultancy") is committed to preventing modern slavery and human trafficking in all areas of our business operations and supply chains. This policy outlines our stance and the measures we take to ensure compliance with the Modern Slavery Act 2015.

2. Our Commitment

We strongly oppose all forms of modern slavery, including forced labour, bonded labour, human trafficking, and exploitation. We are committed to acting ethically and with integrity in all business dealings and relationships.

As a student consultancy service, we recognize our specific responsibility to protect students—particularly international and vulnerable individuals—from any form of exploitation or coercion.

3. Scope

This policy applies to:

- All staff, employees, volunteers, and contractors
- Partner institutions and agents
- Suppliers and third-party service providers

4. Definition of Modern Slavery

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. This includes:

- Forced labour
- Human trafficking

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- Debt bondage
- Domestic servitude
- Exploitation for financial or personal gain

5. Risk Areas in Student Consultancy

We recognize that the following areas may present higher risk:

Third-party education agents and recruiters

We take steps to assess and monitor these areas and expect all partners to operate in compliance with UK law and international human rights standards.

6. Our Actions

To prevent and mitigate modern slavery risk, we:

- Conduct due diligence on all suppliers and partners
- Require ethical compliance clauses in contracts
- Train staff to recognize and respond to signs of exploitation
- Provide clear reporting channels for concerns
- Support students in understanding their rights and accessing help

7. Reporting Concerns

Staff, students, and partners are encouraged to report any suspicions of modern slavery or unethical practices. Reports can be made:

- In person or in writing to a designated Safeguarding Officer
- Anonymously through our reporting system (if available)
- To external authorities such as the Modern Slavery Helpline (0800 0121 700)

All concerns will be investigated confidentially and without fear of retaliation.

8. Training and Awareness

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All staff and consultants will receive training on:



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- Identifying signs of modern slavery
- Understanding reporting procedures
- Supporting at-risk students

9. Review and Monitoring

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This policy is reviewed annually and updated as necessary to reflect changes in legislation or best practices. Compliance is monitored through audits and stakeholder feedback.