

Modern Slavery Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

8 signs of modern slavery are:-

- Evidence of a workplace being used for accommodation
- Workers are distrustful of authorities
- Workers look uneasy, unkempt or malnourished
- Signs of psychological trauma
- Untreated injuries
- Evidence of control over movement (being picked up and dropped off in groups)
- Signs of substance abuse
- Workers don't know work or home address

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

We expect the same high standards from all of our external companies, awarding bodies, funding companies and any other partners. Furthermore, we will strive to identify potential cases of modern slavery within our delivery partners and apprentice employers and take immediate and appropriate action.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility of the Policy

Swarm's Chief Executive Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Head of Operations and Quality has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance of the Policy

All staff must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify a line manager or the Head of Operations and Quality as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, they should raise it with a line manager or the Head of Operations and Quality.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any business with whom we engage. If staff believe that they have suffered any such treatment, they should inform a line manager immediately.

Communication and awareness of the Policy

Our zero-tolerance approach to modern slavery will be communicated to all staff, external companies, learners, and other business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of the Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Chris Perry - CEO