

HANKIN LIMITED

Modern Slavery and Human Trafficking Policy

Hankin Limited t/a Start Using AI (SUAI)

Version	Version 2
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1. Introduction

This policy sets out our commitment to preventing modern slavery and human trafficking in all areas of our organisation and supply chains. We recognise our responsibility to act ethically, with integrity and transparency in all business relationships, and to implement effective systems and controls to safeguard against modern slavery.

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking.

Hankin Limited t/a Start Using AI (SUAI) is a UK-based training provider delivering digital and AI skills programmes. We operate primarily as a home-based organisation, delivering the majority of our services online, with occasional use of hired office or training spaces where in-person delivery is required.

Our supply chains are limited and typically include digital platform providers, professional services and independent contractors supporting delivery.

2. Our Commitment

We are committed to:

- Acting with integrity and transparency in all business dealings
- Ensuring modern slavery is not taking place in any part of our organisation or supply chains
- Promoting a culture where concerns can be raised without fear of retaliation
- Complying with all relevant legislation, including the Modern Slavery Act 2015

3. Scope

This policy applies to all individuals working for or on behalf of the organisation, including:

- Employees
- Contractors and consultants
- Suppliers and service providers

- Partners and stakeholders

4. Learners and Safeguarding Context

As a training provider, we recognise that learners may be vulnerable to exploitation, including forms of modern slavery.

We are committed to:

- Ensuring all learners are treated fairly, safely and with respect
- Maintaining safeguarding practices that protect learners from harm or exploitation
- Identifying and responding to any signs of modern slavery or exploitation among learners

All staff involved in delivery are expected to remain vigilant and report any concerns in line with our safeguarding and reporting procedures.

5. Responsibilities

Senior management has overall responsibility for ensuring this policy is implemented and complied with.

All staff, contractors and partners are responsible for:

- Understanding and complying with this policy
- Being alert to the risks of modern slavery
- Reporting any concerns or suspicions

6. Risk Assessment and Due Diligence

We take a risk-based approach to managing modern slavery risks. This includes:

- Assessing potential risks within our operations and supply chains
- Working with suppliers who share our commitment to ethical practices
- Avoiding relationships with organisations that do not demonstrate appropriate standards
- Including expectations around modern slavery in supplier agreements where appropriate

Given the nature of our operations, the risk of modern slavery within our direct business activities is considered low. Potential areas of risk may include the use of external contractors, freelancers or third-party service providers.

To manage these risks, we take proportionate steps to ensure that suppliers and contractors are reputable and operate in line with expected legal and ethical standards.

7. Reporting Concerns

All individuals are encouraged to report any concerns related to modern slavery or human trafficking.

Reports can be made to senior management or through internal reporting channels. All concerns will be taken seriously and investigated appropriately.

We are committed to ensuring that no individual suffers any detrimental treatment as a result of reporting concerns in good faith.

8. Training and Awareness

We ensure that relevant staff are aware of the risks of modern slavery and understand how to identify and report concerns. This includes:

- Providing guidance on recognising signs of modern slavery
- Promoting awareness of this policy across the organisation
- Ensuring staff understand how to escalate concerns appropriately
- Linking modern slavery awareness with safeguarding responsibilities where appropriate

9. Monitoring and Continuous Improvement

We are committed to reviewing and improving our practices to combat modern slavery. This includes:

- Periodic review of this policy
- Monitoring the effectiveness of procedures
- Reviewing supplier relationships where appropriate
- Recording and reviewing any concerns raised
- Taking action where improvements are identified

As a small organisation with a low-risk profile, our monitoring approach is proportionate, but we are committed to strengthening our processes as the organisation grows.

10. Approval and Review

This policy is approved by senior management and will be reviewed annually to ensure it remains effective and up to date.

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