

LUMA EDUCATION

Modern Slavery and Human Trafficking Policy

Voluntary public statement for Luma Education operations and supply chains

Document control	Details
Organisation	Care and Horizon Ltd trading as Luma Education
Company number	16692356
Registered office	1 Quality Court, London, England, WC2A 1HR
Website	www.lumaeducation.co.uk
Main telephone	020 3507 0057
Email / policy contact	hr@lumaeducation.co.uk
Policy owner	Director
Issue date	10 June 2026
Version	1.0
Review date	September 2026, or earlier if guidance, provision, website services or organisational arrangements change
Status	Public website policy

Plain English summary

We have zero tolerance for modern slavery, human trafficking, forced labour, child exploitation and worker abuse. This statement is published voluntarily to show our standards to families, staff, commissioners and suppliers.

1. Policy statement

Luma Education is committed to acting ethically and with integrity in all business relationships. We will take reasonable and proportionate steps to reduce the risk of modern slavery and human trafficking in our own operations and supply chains.

This policy applies to staff, tutors, directors, contractors, agency workers, suppliers, consultants, subcontractors and any person working on behalf of Luma Education.

2. Our organisation and services

Care and Horizon Ltd trading as Luma Education provides tuition, education support, alternative provision, SEND support, assessments, online support and related education services. Our work involves children, young people, families, staff, tutors, contractors, schools, local authorities and other partners.

3. Legal context and voluntary publication

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations carrying on business in the UK, supplying goods or services and meeting the statutory turnover threshold to publish an annual modern slavery statement. Luma Education publishes this policy voluntarily as part of its governance, procurement and safeguarding culture.

4. Areas of risk

Area	Risk considered	Controls
Recruitment and staffing	Risk of unsuitable, coerced, underpaid or undocumented labour.	Right to work checks, safer recruitment, identity checks, employment records, no recruitment fees charged to workers and fair contracting.
Tutors, agency staff and subcontractors	Risk of weak checks or poor labour standards where workers are supplied by others.	Supplier due diligence, confirmation of suitability checks where relevant, contractual expectations and monitoring.
Cleaning, maintenance, facilities and premises suppliers	Higher-risk sectors can include low-paid or subcontracted labour.	Use reputable suppliers, request assurance where appropriate and act on concerns.
IT, educational resources and goods	Supply chains may include manufacturing or overseas labour risks.	Prefer reputable suppliers and review concerns where identified.
Children and vulnerable learners	Children may be victims of exploitation, trafficking or criminal exploitation.	Separate Safeguarding and Child Protection Policy, staff training, DSL escalation and referral to relevant agencies.

5. Standards expected

- workers must be free to work voluntarily and leave employment or engagement in line with lawful contractual arrangements;
- no worker should be charged improper recruitment fees by Luma Education;
- all workers must have legal right to work where required;
- workers must not be subjected to forced labour, threats, debt bondage, coercion, intimidation, violence or exploitation;
- children and vulnerable people must be protected from exploitation, trafficking and criminal exploitation;
- suppliers and contractors are expected to act ethically and comply with UK law.

6. Due diligence and controls

Control	How it works
Recruitment checks	Identity, right to work, references, qualifications, DBS/suitability checks where relevant and safeguarding suitability review.
Supplier expectations	Suppliers may be asked to confirm compliance with law and ethical labour standards where risk or contract value justifies it.
Reporting routes	Staff, tutors, learners, parents/carers and suppliers can report concerns to a manager, Director, DSL or external authority where needed.
Safeguarding escalation	Concerns involving children, trafficking, exploitation, county lines or criminal exploitation are treated as safeguarding concerns.
Incident response	Concerns will be recorded, assessed and escalated to the appropriate authority, including police, social care, local authority, regulator or professional adviser where required.
Review	The policy will be reviewed annually and when new suppliers, sites, AP arrangements or risks are identified.

7. Training and awareness

Staff and tutors are expected to understand that modern slavery can include forced labour, servitude, human trafficking, child exploitation, criminal exploitation and coercive control. Where a concern relates to a child or vulnerable learner, staff must follow the Safeguarding and Child Protection Policy immediately.

8. Reporting concerns

Anyone can raise a concern by contacting Luma Education using the details in this policy. Where there is immediate danger, call 999. Where a child is at risk, the safeguarding route must be followed without delay.

Contact route	Details
Main telephone	020 3507 0057
Email	hr@lumaeducation.co.uk
Website	www.lumaeducation.co.uk
Emergency	999 where there is immediate danger or a crime in progress

9. Approval

This policy has been approved by senior leadership and will be reviewed annually. If Luma Education becomes legally required to publish a statutory modern slavery statement, the organisation will ensure the statement meets the applicable statutory publication requirements.

Approval and review

Approval item	Details
Approved by	Aiden Bayati, Director
Issue date	10 June 2026
Next review	September 2026, or earlier if guidance, provision, website services or organisational arrangements change
Distribution	Website, parents/carers, learners, staff, tutors, commissioners and partners on request