



## **Modern Slavery Policy**

### **Purpose**

- To ensure the prevention, detection and reporting of modern slavery in any part of our business or supply chains
- Staff are aware of the Policy and can raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage
- Ensure any suspected breach of this policy can be investigated

### **Scope**

This policy applies to all persons working for the Group or on behalf of Inspire Education Group in any capacity, including employees at all levels, directors, officers and agency workers.

### **The 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 which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Inspire Education Group (IEG) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

The Group is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our zero-tolerance approach to modern slavery is communicated to our suppliers, contractors and business partners at the outset of our business relationship with

them and reinforced as appropriate thereafter through our Supplier Code of Conduct.

IEG may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The Corporation has overall responsibility for approving this policy. Managers have day to day responsibility to ensure compliance with our legal and ethical obligation

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### **Responsibilities**

The Group Chief Executive Officer is responsible for developing, implementing and maintaining adequate systems of internal control to prevent Modern Slavery. They are supported by the Executive Team, and for Higher Education the UCP Academic Director.

Heads of Faculty, Group Directors and other budget holders are responsible for familiarising themselves with the policy and ensuring awareness of modern slavery in all procurement activities and contract management.

The Procurement team is responsible for ensuring adequate due diligence on suppliers of high-risk goods or services, and advising purchasing managers of modern slavery risks.

### **Related Documents**

PRO001 - Procurement Policy  
HR001 - Whistleblowing Policy  
HR002 - Code of Conduct Ethics Policy