



# Modern Slavery Policy

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V3	General Update	Alison Hughes		03/02/21
V4	General update	Earl Hibbert	Earl Hibbert	19/08/22

## Introduction

System Group are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business and supply chains. We expect the same high standards from all of our employees, suppliers, clients other stakeholders. 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 and we expect that our suppliers will uphold their own suppliers to System Group high standards.

## Aim

To ensure that all employees know what constitutes as modern slavery, how to detect it if necessary and how to report it.

## Scope

This policy applies to all employees across all levels of the business, stakeholders and learners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Definition

Modern slavery is a crime and a violation of fundamental basic human rights. It can take various forms including slavery, servitude, forced and compulsory labour and human trafficking. The commonality of all of these deprive a person's liberty by another in order to exploit them for personal or commercial gain.

System Group have a zero-tolerance approach to any kind of modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

System Group considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.
- Having their finances taken or controlled by another person

## Our commitments

System Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand

that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

System Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to System Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. System Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

System Group expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- zero-tolerance approach to modern slavery in our organisation and our supply chains.
- prevention, detection and reporting of modern slavery in any part of our organisation or supply chain which is the responsibility of all those working for System Group or on our behalf. Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- demonstrate commitment to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- take a risk-based approach to our contracting processes and keep under review.
- assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Using a risk based approach, we will assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

### Supply Chain

System Group strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We will continue to implement systems and controls aimed at ensuring that modern slavery is not taking place within our organisation or in the supply chain. We expect our suppliers to require their suppliers to uphold the same high standards.

### Legislation

Modern slavery is constituted within the Modern Slavery Act 2015 (the "Act") by the offences of "slavery, servitude and forced or compulsory labour" and in "human trafficking"

Provision within the Act seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations.

**If an employee suspects modern slavery**

If an employee suspects the treatment of any employees or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, they must raise it with Karen Barnham in the first instance via [Karen.Barnham@system-group.com](mailto:Karen.Barnham@system-group.com)

Karen Barnham is the Designated Safeguarding Lead for System Group and is responsible and accountable to the board. Her role ensures that this policy and culture is promoted and enforced throughout System Group. If not adhered to in spirit and law, then we will undertake relevant action to ensure the Company meets its obligations.

System Group aim to encourage open communication and will support any employee who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Furthermore, we are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion that modern slavery has occurred or is taking place, irrespective of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.