



Modern Slavery and Human Trafficking Policy

Approved by:	Governing Board	Date: May 2024
Last reviewed on:	May 2024	
Next review due by:	May 2025	

1. Introduction

This policy has been produced in accordance with Section 54(1) of the Modern Slavery Act 2015 and ensures transparency between us, and our suppliers of goods and services.

Spark Academy are committed to operating our business ethically and with integrity and likewise, we are committed to preventing and driving out acts of modern slavery and human trafficking from occurring within our business and supply chain, in both the UK and overseas.

Slavery is defined as holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour, in contravention of Article 4 of the Human Rights Act 1998.

Human Trafficking is defined as an offence if a person arranges or facilitates the travel of another person with a view to them being exploited. It is irrelevant whether the person consents to the travel.

2. Policy

We will not support or deal with any business knowingly involved in modern slavery or human trafficking. As part of our due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier.

Imported goods from sources outside the UK are potentially more at risk for slavery or human trafficking issues. The level of management control required for these sources is continually monitored.

We also take steps to ensure that our suppliers are aware of our policies, and we expect them to adhere to the same high standards.

As part of our commitment to operating ethically and in a manner which complies with relevant laws, we have policies in place to support this, including:

- Anti-Bribery Policy
- Equality Policy, and
- Whistleblowing Policy
- Staff Disciplinary Procedures

3. Preventing and Reporting Modern Slavery and Human Trafficking

We each have a responsibility to prevent, detect, and report acts of modern slavery and human trafficking within the business and from within its supply chains.

Any suspicion or attempt of modern slavery and human trafficking committed by or against an employee, agent, or other party acting on our behalf must be reported immediately to Senior Management.

Our Whistleblowing Policy and Procedure is in place to protect anyone reporting reasonable suspicions. Any breach of this policy will result in disciplinary action and possibly summary dismissal.