

PE Scholar Voluntary Slavery and Human Trafficking Statement

At PE Scholar we oppose slavery and human trafficking in all its forms.

We are committed to improving our practices to combat modern slavery in our business by taking all the steps we can to ensure our supply chains are free from slavery and human trafficking.

Although we are not required by law to publish a Modern Slavery Statement, transparency and integrity are values which underpin our organisation. We have therefore chosen to make this statement voluntarily, to demonstrate that we are committed to ethical trading principles and to describe how we identify the risks of modern slavery and human trafficking in both our business and our supply chains.

Below we set out the steps we have taken in the financial year to 31st March 2023 to understand potential modern slavery risks within our business structure and supply chain, and as well as the steps taken to eradicate these risks.

1. About us

We are a small business providing services in the physical education sector. Our business activities include the provision of digital support tools for physical educators; face-to-face and digital delivery of accredited professional development; content generation; consultancy services and online retailing.

We also operate an outreach fund for the development of projects which support the promotion and development of high quality school sport and physical education.

2. Our Supply Chains

Our business is services based. We do not process or manufacture goods (with the limited exception of the re-sale of course materials digitally or printed) and operate remotely. Therefore, we are very limited in the amount of physical goods that we buy.

Our supply chains consist of approximately 30 third parties, for the supply of the following goods and services:

Goods	Services
IT equipment - hardware (laptops/telephones/accessories)	Project partners - long term collaboration partnerships for various digital projects
Company branded clothing	Design services including graphic design for digital or print media
Digital (e.g. CDs) and printed copies of course materials and publications	Printing services
Office consumables e.g. stationary	Consultancy services (such as our education consultants)
	Government agencies (such as to conduct DBS checks on our behalf)
	Financial services including banking facilities, insurance, legal, pension and investments.
	Accountancy services including payroll services
	IT services including remote infrastructure providers
	Telecommunications services such as broadband and mobile phone providers

3. Our Business Activities

We have worked hard to ensure that our operational policies support our commitment to avoiding modern slavery and to ensure fair and responsible relationships with our employees, contractors and business partners. They include:

- **Anti-Slavery Policy** - implements and enforces effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- **Anti Bribery Policy** - this policy ensures our staff are alert to any instances of bribery and sets out our process for reporting and investigating any suspicious activity.
- **Whistle Blowing Policy** - ensures staff are supported to speak out to encourage openness and accountability.

- **Equal Opportunities Policy** - ensuring we do not discriminate in our recruitment process and that all employees and subcontractors are treated with respect and dignity.
- **Disciplinary Procedure** - provides for swift action to deal with any allegations of bullying or harassment.

Additionally, we employ a Legal and Policy Lead to manage all third party contracts. This provides us with valuable oversight of and accountability for our corporate activities. Due diligence is carried out prior to entering into a contract (as detailed below) and ongoing management is carried out thereafter to ensure that suppliers operate as per their contractual agreements.

Any concerns relating to modern slavery or any other issue relating to the ethics of our operations are raised to a nominated director for investigation.

4. Due diligence and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chain, we carry out the following due diligence before engaging with third parties:

- The modern slavery statement produced by the third party will be scrutinised to ensure it contains a satisfactory commitment backed by genuine and robust evidence that the organisation has minimised the risk of modern slavery throughout its business.
- In the rare cases where we purchase goods produced in high risk industries (such as garment production or IT hardware), suppliers who operate to an appropriate code of practice such as the Ethical Trading Initiative Base Code will be favoured over those who do not.
- When procuring from third parties who are not subject to UK labour laws we will ensure that contracts include commitments to acceptable working conditions and payment of a living wage, and push-through conditions requiring the same from any subcontractor of our supplier.
- Where we procure the supply of services using our own contract templates, we will include contractual requirements that our subcontractors adhere to this policy and those outlined at 3 above.

- When trading with suppliers on their standard terms of business that do not contain explicit anti-slavery clauses, we vet third parties to ensure that they are committed to ethical labour practices.
- Where we are able to procure the supply of services using our own contract templates, we include anti-slavery and human trafficking provisions.
- We require that any subcontractors (usually individuals) or casual workers adhere to the policies outlined at 3 above.

Training

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff which is proportionate to the risk inherent in the activities they carry out within the business.

This voluntary slavery and human trafficking statement is made for the financial year ending 31st March 2023.

It was approved by the board on 20th September 2023



Tim Durden-Myers

For and on behalf of PE Scholar Ltd

Date: 20th September 2023

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Final Audit Report

2023-09-20

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