

Modern Slavery Policy

Dec 2021

Version 1

1. Scope

This policy applies to all staff at Expanse Learning.

2. Introduction and 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 to exploit them for personal or commercial gain. Expanse Learning has a zero-tolerance to modern slavery.

Expanse Learning is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in Expanse Learning's own business or in any of our supply chains.

Expanse Learning are also committed to ensuring transparency in business and in approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. Expanse Learning expects the same high standards from all contractors, suppliers, and other business partners.

This policy is being implemented to ensure that we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment 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.

In the case of employees, this policy applies to all persons working for Expanse Learning or on Expanse Learning's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. In the case of employees, this policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Responsibility for the policy

The Executive Leadership Team has overall responsibility for ensuring this policy complies with Expanse Learning's statutory obligations.

Expanse Learning school and college have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers 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 and partners.

Expanse Learning employees are invited to comment on this policy and suggest ways in which it might be improved and should be addressed to Tony Brown (CEO) tony.brown@expansigroup.co.uk

4. Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of Expanse Learning business or supply chains is the responsibility of all. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Expanse Learning business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within Expanse Learning or any tier of Expanse Learning's supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.

Expanse Learning aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Expanse Learning is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Expanse Learning's business or in any of Expanse Learning's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Expanse Learning's Grievance Policy.

5. Communication and awareness of this policy

Information on this policy, and on the risk Expanse Learning faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work at Expanse Learning, and regular information will be provided as necessary.

Expanse Learning's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

Further information and guidance can be found at:

<https://www.gov.uk/government/collections/modern-slavery-bill>

www.gov.uk/guidance/publish-an-annual-modern-slavery-statement

6. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, up to and including dismissal.

Expanse Learning may terminate business relationships with other individuals and organisations working on Expanse Learning’s behalf if they breach this policy.

7. Monitoring arrangements

This policy will be reviewed every 12 months but can be revised as needed

Impact of non-compliance for:

Staff:	Disciplinary action, prosecution, prohibition from teaching.
Student:	Not applicable
Legislation/organisational:	Reputational damage, litigation, statutory and non-regulated compliance. prosecution
Compliance lead:	Head of Shared Services
Policy Reference:	ELGR-POL-ORG-006
Version:	1
Agreed policy location:	DatabridgeMIS and Company Website
Does the policy require Governor approval?	No

Approval

<p>Prepared by Scott Roberts (Assoc. CIPD) 09/12/2021</p>  <p>Head of Shared Services</p>	<p>Approved by Tony Brown 09/12/2021</p>  <p>CEO</p>	<p>Counter Signatory Richard King 09/12/2021</p>  <p>Director of Schools, Pre 16 Education</p>
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Version Control

Version	Date	Revision	Review Date
1	09/12/2021	Policy Review	08/12/2022
2			
3			
4			
5			