

Modern Slavery Statement



The Spark Group

Introduction

The Spark Group is committed to combating modern slavery and human trafficking in all its forms and we recognise our responsibility to promote ethical practices within our operations and supply chains. This Modern Slavery Statement outlines the actions we are taking to prevent and address modern slavery risks.

Our Business

The Spark Group provides business support, training and education. We strive to maintain the highest standards of integrity, fairness, and respect for human rights in everything we do. We believe in creating a positive and sustainable impact on society while conducting our business activities.

Our Policies and Commitments

We have implemented a range of policies that explicitly prohibit modern slavery, human trafficking, and forced labour and to protect human rights. These policies encompass all aspects of our business operations, including our employees, suppliers, contractors, and partners. Our policies include:

Ethical Employment Practices: We comply with local and international labour laws and regulations, ensuring fair wages, reasonable working hours, and safe working conditions for our employees. We promote diversity, equality, and respect for employee rights..

Supplier Code of Conduct: All suppliers and contractors must adhere to a Supplier Code of Conduct, which requires compliance with anti-slavery laws and ethical labour practices.

Due Diligence and Risk Assessment: We conduct ongoing risk assessments to identify and mitigate potential risks of modern slavery within our supply chains. High risk suppliers are subject to enhanced checks and, where appropriate, audits.

Awareness and Training: We provide training and awareness programmes to our employees to enhance their understanding of modern slavery issues, including recognising the signs of exploitation and how to report concerns. We encourage a culture of openness and vigilance, ensuring that any suspicions or reports of modern slavery are promptly addressed.

Protecting Our Learners

At The Spark Group, we recognise that learners participating in work experience, internships, apprenticeships, and other training programmes may be vulnerable to exploitation, including modern slavery. To safeguard our learners, we:

- **Vet and monitor all placement providers and employers** to ensure they comply with labour laws and ethical standards, including those related to modern slavery.
- **Maintain clear safeguarding and reporting procedures** for learners who may experience or witness exploitation during placements or training.
- **Work closely with placement providers** to ensure safe, fair, and lawful working conditions for all learners.
- **Provide learners with access to confidential support and advice** if they have concerns about exploitation or modern slavery during their work experience or training.

Reporting and Monitoring

We encourage the reporting of any concerns related to modern slavery within our organisation or supply chains. Our employees and learners are encouraged to report any suspicions or observations through our established reporting channels. We treat all reports seriously and will take appropriate action in response to any identified risks or violations.

We are committed to monitoring and reviewing our efforts regularly to ensure the effectiveness of our policies and procedures. We will continually assess and improve our approach to combatting modern slavery, taking into account any changes in legislation, best practices, and societal expectations.

Annual Review and Approval

This Modern Slavery Statement has been approved and will be reviewed annually and updated as necessary to reflect our ongoing commitment to combatting modern slavery and human trafficking.

This Statement has been approved by The Spark Group's Senior Leadership Team.

Signed: Debbie Sturridge

Position: Business Enablement Manager

Revision Date: 31.05.25

Next Review Date: 01.06.26

