Modern Slavery Statement

The Spark Group

Purpose

Although The Spark Group is not legally required to publish a Modern Slavery Statement under Section 54 of the Modern Slavery Act 2015, we recognise our responsibility to operate ethically, safeguard individuals from exploitation and promote respect for human rights throughout our organisation and supply chains.

This Statement outlines the steps we take to reduce the risk of modern slavery and ensure concerns are identified, reported and acted upon appropriately.

What is Modern Slavery?

Modern slavery is a serious crime and a violation of fundamental human rights. It takes many forms and can affect people of any age, gender or background.

Examples include:

- Human trafficking – recruiting, transporting or harbouring people through force, deception or coercion for the purpose of exploitation;
- Forced or compulsory labour – where individuals are made to work against their will through threats, violence or intimidation;
- Debt bondage – where a person is forced to work to repay a debt that they are unable to clear;
- Child exploitation – where children are exploited for labour or criminal purposes

Our Organisation

We are committed to maintaining high standards of integrity, fairness and respect for human rights in everything we do.

We expect the same standards from our employees, contractors, employers, work placement providers, suppliers and partners.

Our Commitment

The Spark Group is committed to:

- Preventing modern slavery and human trafficking within our organisation and supply chains;
- Promoting ethical employment and business practices;
- Working with organisations that share our commitment to fair and lawful working practices;
- Raising awareness of modern slavery and how to recognise the signs;
- Supporting individuals who may be at risk of exploitation;

- Reporting concerns promptly and working with relevant agencies where appropriate

Ethical Employment Practices

The Spark Group complies with UK employment legislation and recognised good practice.

We are committed to:

- Fair recruitment and employment practices;
- Paying employees fairly and lawfully;
- Providing safe and healthy working conditions;
- Treating everyone with dignity and respect;
- Promoting equality, diversity and inclusion across our organisation

Suppliers, Contractors and Partners

We seek to work with suppliers, contractors, employers and partners who share our commitment to ethical working practices.

Where appropriate, we will:

- Select reputable suppliers and partners;
- Consider safeguarding and ethical practices when establishing new relationships;
- Raise concerns where poor or unethical practices are identified;
- Avoid working with organisations where significant modern slavery risks are identified and cannot be satisfactorily addressed

To effectively mitigate modern slavery risks, we engage in supply chain mapping for our critical partners. We proactively assess these relationships for risk and apply our supplier code of conduct. Where significant risks are identified, we reserve the right to audit or request an improvement plan as a condition of our ongoing relationship.

Protecting Our Learners

The Spark Group recognises that learners participating in work experience, work placements, apprenticeships and other employment-related learning may be vulnerable to exploitation.

To help protect learners, we will:

- Carry out appropriate checks on employers and work placement providers;
- Work with employers to promote safe, lawful and ethical working environments;
- Provide learners with safeguarding information, including how to recognise and report concerns about exploitation;
- Monitor learner welfare throughout placements and training programmes;
- Ensure learners know who to contact if they have concerns about their safety or wellbeing;
- Take immediate action where concerns about exploitation or modern slavery are identified

Recognising the Signs

Employees should remain alert to indicators that someone may be experiencing exploitation.

Possible signs may include:

- Fearful, anxious or withdrawn behaviour;
- Restricted freedom of movement;
- Someone else speaking on their behalf or controlling communication;
- Poor living or working conditions;
- Working excessive hours without appropriate pay;
- Unexplained injuries or signs of neglect

These signs do not necessarily indicate modern slavery but should always be taken seriously.

Training and Awareness

We provide specific training to relevant staff, including procurement and management, to help them identify and address modern slavery risks within our operations and supply chains.

Reporting Concerns

Anyone who suspects modern slavery or exploitation should report their concerns immediately.

Concerns may be reported to:

- A line manager;
- Any member of the Senior Leadership Team;
- A tutor (for learners);
- The Designated Safeguarding Lead; or
- Through our Whistleblowing Policy where appropriate

Reports may be made verbally or in writing.

All concerns will be taken seriously, investigated appropriately and handled sensitively.

No individual will suffer detriment for raising a genuine concern in good faith.

In accordance with our contractual obligations, The Spark Group will immediately notify relevant funders and authorities if we suspect or become aware of any Modern Slavery offence, investigation, or significant risk within our own operations or supply chain.

We provide accessible grievance mechanisms, including our Whistleblowing Policy, which is available to all employees, sub-contractors, and supply chain partners, ensuring that concerns can be raised safely without fear of detriment.

Safeguarding

Modern slavery is a safeguarding issue.

Where concerns involve learners, vulnerable adults or anyone believed to be at risk of harm, they will be managed in accordance with the Safeguarding and Prevent Policy and referred to the Designated Safeguarding Lead without delay.

Where appropriate, concerns will also be referred to external agencies, including the police or relevant safeguarding authorities.

Confidentiality

Information relating to concerns will only be shared with those who need to know in order to investigate the matter, safeguard individuals or fulfil legal responsibilities.

Absolute confidentiality cannot always be guaranteed where safeguarding or legal obligations require information to be shared.

Monitoring and Review

The Spark Group will review this Statement annually, or sooner where there are changes to legislation, statutory guidance or organisational requirements.

We will continue to review our practices, raise awareness and strengthen our approach to preventing modern slavery across our organisation and the services we deliver.

Approval

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

Version number:	3.0
Document written by:	Debbie Sturridge, Business Manager
Date:	14.07.26
Review due:	June 2027