

## **EDClass Limited Modern Slavery and Human Trafficking Statement**

### **Introduction: -**

Because EDClass works primarily with UK-based suppliers and contractors, their employees are protected under UK employment law and working time directives. Whilst EDClass does not conduct business in countries where there is a documented problem with human trafficking or modern slavery, we remain acutely aware of the need to ensure that companies within our supply chain share our commitment to treating employees fairly and ethically. EDClass is committed to the highest standards of ethical conduct in all our activities and to making continuous improvements in this area. We believe that there is a low risk of slavery or human trafficking having a connection with our activities.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within EDClass and within our supply chains to ensure that we are fully compliant with the Modern Slavery Act 2015. EDClass is committed to giving young people an excellent education within a happy, caring and supportive online environment.

### **Policies on modern slavery: -**

The policies we have in place and our Modern slavery and human trafficking statement reflect our commitment to paying people fairly and properly for their work; acting ethically and with integrity in all our business relationships; and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in EDClass or our supply chains. All policies are reviewed by senior managers and signed off by the CEO, following (where appropriate) thorough consultation with all relevant stakeholders. Policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change. Due diligence processes that we choose to follow, with assistance from the governance and compliance and/or human resources teams, are responsible for investigating any suspected instances of modern slavery and human trafficking.

### **Risk assessment: -**

EDClass has assessed the risks of modern slavery and human trafficking as follows: -

We do not believe there to be any high-risk or medium risk operations within EDClass or within our supply chain with regards to modern slavery and human trafficking. The low risk provisions that EDClass recognise could pose a threat in their supply chain is the manufacturer of branded uniform that staff wear and the IT and Technology that is required in order for EDClass to operate its services. It is likely that some of these items are manufactured overseas.

### **Recruitment and training for team: -**

EDClass operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the "Keeping Children Safe in Education" guidelines. All our staff are employed directly on a permanent basis. Those successfully appointed are sourced from multiple recruitment services which utilise a range of direct advertising, social media, databases and existing staff referrals, or via approved third-party agencies. In line with our commitments to safeguarding, we operate a preferred supplier group for employment agencies, with each agency agreeing to terms of business prior to any engagement. Agencies are selected based on their vetting policies, compliance processes, worker pay, and mandatory industry accreditation. Copies of the agency's modern slavery statement are also requested. Those agencies selected to work with us are reviewed regularly for best practice, and all new employment agencies wishing to be considered are reviewed against our

requirements, before accepting workers from that agency. All employees who join us are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right-to-work checks.

**Fair pay: -**

EDClass is committed to ensuring that all staff receive fair remuneration for the job they perform. This is demonstrated through our commitment to ensuring staff receive, as a minimum, the National Minimum Wage, set annually by the government. This commitment means that all staff, receive at least the appropriate National Minimum Wage.

**Whistleblowing: -**

EDClass encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our Whistleblowing policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Measuring effectiveness: -**

EDClass strives to maintain the highest standards of employee conduct and ethical behaviour and our policies enhance our commitment to act ethically and with integrity. Policies and procedures are kept under review to make sure they reflect the changing needs in education and of our staff, students and the communities it serves.

**Procurement practice: -**

EDClass is committed to ensuring that its key suppliers adhere to the highest standards of ethics. We recognise that modern slavery is a complex supply chain issue and suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We will work with our key suppliers to ensure that they meet these standards: any serious violation of our standards will lead to a review and possible termination of the business relationship. All major supply contracts are reviewed regularly with the results reported to our CEO to ensure that they are complying with our expectations.

**Suppliers: -**

EDClass operates a due diligence process for suppliers. This Modern Slavery and Human Trafficking Statement is published on our website.

**Our commitment: -**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes EDClass' Modern Slavery and Human Trafficking statement.