

## Modern Slavery Statement

### Introduction

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 in order to exploit them for personal or commercial gain. This statement sets out the actions taken by Spirit Studios to understand all potential modern slavery risks related to our organisation and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own operations and our supply chains.

### Policy and Practices

Spirit Studios is adopting a 'Responsible Procurement' Policy that will ensure that decisions taken by Spirit Studios on the procurement of goods, works or services are undertaken in line with our commitments under the following themes:

- Delivering social value.
- Improving environmental sustainability.
- Promoting ethical sourcing practices.
- Encouraging equality, diversity and inclusion.

Spirit Studios is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business ensuring that this commitment is met in a consistent and appropriate manner.

Spirit Studios' Human Resources team ensures staff are appointed legally, and rigorous checks are carried out on all new appointments, both permanent and fixed term, including student workers and freelancers. The appointment of temporary or interim resources are approved and monitored by both Human Resources and independent teams.

The Academic team is responsible for supporting equality and diversity policy development and implementation, and seeks to engage all Spirit Studios staff in promoting a positive and fully inclusive work environment. Spirit Studios gives legal consideration to the requirements of the Equality Act 2010.

Spirit Studios is committed in its pursuit of academic excellence to equality of opportunity and to a pro-active and inclusive approach to equality, which supports and encourages all under-represented groups, promotes an inclusive culture, and values diversity.

## **Safeguarding**

Spirit Studios has Safeguarding and Welfare policies in place which focus on the need to ensure that its students, staff and visitors are safe, feel safe and are fully supported in this respect by their studies. These policies provide a framework for Spirit Studios to develop secure processes for identifying Modern Slavery supporting students at risk of abuse. The Welfare and Wellbeing Policy specifically identifies modern slavery and trafficking as forms of harm. Designated Safeguarding Leads are required to ensure that tutors and support staff have at least annual safeguarding training and access to up to date relevant information in relation to forms of neglect and abuse. Safeguarding students who may have been trafficked or Modern Slavery situations form a part of this training. Spirit Studios has processes in place to ensure that the voice of a student or staff is heard and that students are able to disclose any concerns they may have. If students are persistently absent from classes the reasons for this will be investigated. Spirit Studios has a designated Safeguarding Lead and Safeguarding Deputy who carry out audits to provide assurance that safeguarding policies and procedures are adhered to and that training has been delivered.

## **Values**

Spirit Studios has zero tolerance to slavery and human trafficking. Any supplier or potential supplier who does not adhere to our values will be suspended or removed from Spirit Studios supplier list and will not be considered for future supply to Spirit Studios unless they are able to demonstrate full adherence with the requirements of the Modern Slavery Act 2015. Should any supplier breach any requirements Spirit Studios has the right to terminate the contract.

## **Legal Context**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31 October 2022

- Modern Slavery Act 2015 - Overview and supporting documents can be found on the government website [modern-slavery-bill](#)