



## **Modern Slavery Act 2015: Slavery and Human Trafficking Statement for the Financial Year ending August 2018**

### **INTRODUCTION**

Modern slavery is a crime and 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.

The Modern Slavery Act 2015 introduced changes in UK law focused on increasing transparency in supply chains. Specifically, large businesses are required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery.

This statement sets out the steps we have and are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or businesses and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

### **ORGANISATION'S STRUCTURE**

Cambridge Education Group is a provider of Higher education and professional educational and learning services in the Education sector. We operate within the UK, Europe, Asia, the US & Canada and are organised into the following brands; CSVPA, CATS, CEG Digital, Stafford House, **ONCAMPUS**.

### **OUR SUPPLY CHAINS**

We work with a wide range of suppliers and partners, some of which rely on agencies to supply both temporary and permanent staff. By the nature of these businesses, some of our suppliers are potentially at a higher risk than others and as such we use detailed category management to ensure rigorous management practices are maintained when tendering for goods and services. Our Master Categories include; Facilities Management, Professional Services, IT, Marketing, Print & Stationery, Estates Management, Subscriptions, Travel and Utilities.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Cambridge Education Group has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business

dealings and relationships to implement and enforce appropriate and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. We are reviewing an Anti-Slavery and Human Trafficking Policy that will reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, we are putting in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We are reviewing our supply chain management processes to ensure all those in our supply chain and contractors comply with our values and their legal obligations. This includes seeking confirmation from key suppliers of the Group that they have implemented contractual arrangements which prohibit modern slavery and trafficking and seeking confirmation that they have adopted their own anti-slavery and human trafficking policies. We have/are introducing in our standard terms and conditions of trading requirements for suppliers to comply with all applicable anti-slavery and human trafficking laws. A number of our key commercial supply arrangements already contain specific provisions regarding slavery and human trafficking and contractual arrangements will be updated, where necessary, upon renewal.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be providing appropriate training to our relevant staff to raise awareness and highlight any areas of concern they may have.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We have not identified any instances or indications that either slavery or human trafficking occurs in our supply chain. As such, we have not considered it necessary to adopt any formal key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. We intend to keep this under review.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending August 2018.



**Michael Ioakimides**  
CEO, Cambridge Education Group

Date: 3/5/2018.