

Modern Slavery Act Policy Statement

1. Introduction

1.1 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 to exploit them for personal or commercial gain. OMG Education (OMG) has zero tolerance for modern slavery. OMG is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in OMG's own business or in any of OMG's supply chains.

1.2 OMG makes a policy statement about its commitment to dealing with Modern Slavery, which is published on our website and reviewed annually. All staff, governors and Trustees are expected to read the policy statement and familiarise themselves with its contents.

1.3 OMG is committed to ensuring transparency in business and in its approach to tackling modern slavery throughout OMG's supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. OMG expects the same high standards from all contractors, suppliers and other business partners.

1.4 This policy is intended to ensure we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains.

1.5 In the case of employees, this policy applies to all persons working for OMG or on OMG's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers (including school Governors), interns, agents, contractors, external consultants, third-party representatives and business partners. In the case of employees, this policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1 Director has overall responsibility for ensuring this policy complies with OMG's statutory obligations.

2.2 OMG Education have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they effectively counter modern slavery.

2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate induction and regular training on it and the issue of modern slavery in supply chains and partners.

2.4 OMG employees are invited to comment on this policy and suggest ways to improve it. Comments, suggestions and queries are encouraged and should be addressed to the Director at OMG.

3. Compliance with the policy

3.1 You must read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of OMG business or supply chains is the responsibility of all. You are required to avoid any activity that might lead to or suggest a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of OMG business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within OMG or any tier of OMG's supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or with OMG's Director.

3.7 OMG aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. OMG is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of OMG's business or in any of OMG's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. You should inform your line manager immediately if you believe you have suffered any such treatment. If the matter is not remedied, and you are an employee, you should raise it formally using the OMG's Grievance Policy.

4. Communication and awareness of this policy

4.1 Information on this policy and on the risk OMG faces from modern slavery in its supply chains must form part of the induction process for all individuals who work at OMG, and regular information and training provided as necessary.

4.2 OMG's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, up to and including dismissal.

5.2 OMG may terminate business relationships with other individuals and organisations working on OMG's behalf if they breach this policy.