



Kingsley: Modern Slavery and Human Trafficking Policy

This policy and statement is made pursuant to section 54(1) of the Modern Slavery Act (2015) and constitutes Kingsley's formal slavery and human trafficking policy. This policy has been approved by the Director and senior management team of the organisation.

Kingsley does not believe there is any place in today's world for slavery and human trafficking and in making this statement commits to ensuring there is no modern slavery or human trafficking in our staff and students supply chains or in any part of our businesses.

We are committed to evolving our practices through all our group to combat slavery and human trafficking and to encourage the same principles and standards from our student recruitment and business partners.

No breaches of the Modern Slavery Act 2015 have ever been reported in 2021 or have been previously.

Our Company Structure

Operating primarily in the London, Kingsley is based in 80-82 Nelson Street.

Our supply chain

Kingsley takes its responsibility for ensuring the risk of modern slavery and human trafficking is minimised across both its staff and student supply chain. It achieves this through a combination of due diligence, transparency and risk mitigation. Kingsley expects its staff to report concerns of non-compliance, no matter how trivial, in line with the established policies and procedures.

Policies on modern slavery

This policy is regularly updated to reflect best practice methodologies, and subsequently approved at Director level.

Our modern slavery policy reflects the Company's commitment to acting with maximum integrity and ethical practice in all its relationships and has implemented

adequate policies, procedures and systems to ensure that slavery and human trafficking is not taking place.

Due diligence processes

In order to identify and mitigate the risks associated with modern slavery and human trafficking, Kingsley has adopted the following processes:

1. We conduct internal audits on our recruitment process to ensure that we only engage eligible workers for agency work.
2. We expect the companies we work with to have anti-slavery and human trafficking policies and processes that cover the subsequent relationships with their suppliers as it is not practical for us to influence and have a direct relationship with all levels of the business relationship.

Risk assessment

With many of the staff on a temporary, contract or permanent basis, we appreciate the importance of robust operational practices. Through the aforementioned due diligence processes, company audits, and internal policies and staff training, we act to minimise the risk of individuals being placed into any form of slavery.

Checks are also undertaken to verify and identify where workers may be sharing bank accounts, addresses and telephone numbers which may be a risk indicator.

Kingsley will continue to assess the risks associated with modern slavery and human trafficking and aim to fully understand other indicators of modern slavery.

Measuring effectiveness

Through regular monitoring, audits and assessments we measure the effectiveness of our risk control measures to ensure that slavery and human trafficking is not taking place in our business, our subsidiary businesses or our staff and student recruitment supply chains.

Our key performance indicators (KPIs) in this instance are:

- 100% pass rate when reviewing recruitment activities of staff and students and their compliance with agreed modern slavery processes.

Training for Kingsley staff

With such a clear focus on maintaining 100% compliance with modern slavery and human trafficking legislation, it is essential that the people within our business receive adequate training and information. We provide information on this legislation and our policies and processes via Kingsley's induction process and training updates.

Employees, workers, business partners and customers are encouraged to report any concerns that may give rise to a risk of modern slavery or human trafficking.

Employees are advised on how to report any concerns they have associated with modern slavery and trafficking.

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