

# Modern Slavery Statement

## Introduction

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that Instep UK has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. We believe that protecting individuals from exploitation and promoting responsible supply chain practices are fundamental to our values and our role within the education and skills sector

This statement sets out the steps we currently take - and the commitments we continue to make - to ensure slavery and human trafficking do not occur within our business or our supply chains

## Slavery and Human Trafficking Statement

Instep UK's core values are at the heart of everything we do. We are committed to running our business responsibly and in accordance with the high standards embedded in our core values.

If we suspect that a person may be a victim of slavery or human trafficking we will notify the relevant public authority respecting all relevant regulations and obligations.

'Individual liberty', 'respect for the rule of law' 'equality', and 'mutual respect' are among our United Values. Slavery and human trafficking are very plainly incompatible with these values.

We expect the same high standards from our suppliers and all external stakeholders we work with.

## Our Organisation

Instep UK is a national training provider delivering education and training to learners aged 16 and above across a wide range of vocational and commercial programmes. We operate

fully remotely, with 80 employed staff, supplemented by a network of self-employed associate trainers who support delivery across the UK.

Because we operate without physical premises, our operational supply chain is relatively simple and low risk by nature.

## **Our Supply Chains**

Instep UK procures goods and services primarily from UK-based suppliers, including:

- Professional services
- Marketing providers
- IT and software services
- Corporate travel providers
- Self-employed delivery associates

We do not procure physical goods from overseas or operate in sectors typically associated with heightened modern slavery risk.

## **Policies Supporting Our Approach**

Our commitment to ethical practice is embedded in our organisational values, including individual liberty, equality, mutual respect, and respect for the rule of law. These values are fundamentally incompatible with slavery or human trafficking.

Instep UK has a range of policies that collectively help safeguard staff, learners and suppliers, including:

- Whistleblowing
- Safeguarding
- Safer recruitment and right-to-work procedures
- Staff code of conduct
- Equality, Diversity & Inclusion
- Health & Safety
- Data Protection & GDPR

## Identifying & Managing Risk

Given our scale, remote operating model and wholly UK-based supplier network, Instep UK's exposure to modern slavery risk is considered low. We do not currently conduct detailed sector-based or geographical risk assessments, as these are not proportionate to the nature and scale of our supply chain.

Instep UK conducts supplier due diligence in a way that is appropriate to the size of our organisation and the low-risk profile of our supply chain. As a remote training provider with fully UK-based suppliers, we do not consider extensive audits or enhanced checks to be proportionate.

Instead, we rely on reasonable checks, such as reviewing publicly available information, confirming that suppliers operate within relevant UK regulatory frameworks, and maintaining open communication with key partners. Should any concerns or red flags be identified, these would be reviewed by senior management and acted on where necessary.

## Training & Awareness

All Instep UK staff receive training on modern slavery, embedded within safeguarding and compliance training frameworks.

This training supports staff to:

- Understand the signs of modern slavery
- Follow internal reporting processes
- Recognise how modern slavery could arise even in low-risk environments
- Support learners and colleagues effectively

Training is refreshed as part of our ongoing compliance programme

## Measuring Our Effectiveness

Instep UK does not use formal KPIs to measure effectiveness in relation to modern slavery, as our overall risk profile is low and such measures would be disproportionate.

We monitor the situation informally through staff training completion, the absence or presence of concerns raised, and general supplier engagement. This approach is appropriate to the size and nature of our organisation, and we will adapt it if our risk profile changes.

## Commitment to Continuous Improvement

Instep UK is committed to ensuring that slavery and human trafficking have no place in our organisation or wider supply chain. Although our risk profile is low, we will continue to:

- Monitor updates to the UK Modern Slavery Act and guidance
- Review opportunities to strengthen supplier risk assessment
- Ensure our training remains current and effective

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