

# Statement under Section 54(1) of the UK Modern Slavery Act 2015 for Seckloe 208 Limited and all its relevant group of companies (the QA Group)\*.

2023/2024

## 1. 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.

We have a zero-tolerance approach and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing procedures to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. Structure of the organisation

The QA Group provides learning, education and talent services in four principal areas which are QA Learning, QA Apprenticeships, QA Higher Education and QA Talent.

QA Learning provides a broad range of business and technical skills courses to public and private sector clients at training centres throughout the UK, QA Apprenticeships works with employers in the UK to provide apprenticeships leading to technical and business skills qualifications, QA Higher Education provides degree courses to domestic and international students at campuses in London, Birmingham and Newcastle and QA Talent hires, trains and deploys tech resource to provide technology skills into public and private organisations.

In the relevant financial year, we had on average 2,600 employees and an annual turnover in excess of £315.7 million. To find out more about the nature of our business, please visit [www.qa.com](http://www.qa.com).

In order to provide services to clients, we work with a range of suppliers including but not limited to professional service firms, utility suppliers, IT vendors, consultants, industry business partners and technology platform providers.

## 3. Policies

As part of our commitment to combating modern slavery, we have implemented the following policies and procedures:

1. **Anti-Slavery Policy**
2. **Supplier Decision Tree Matrix**
3. **Supplier Questionnaires**
4. **Whistleblowing Policy**
5. **Corporate Social Responsibility Policy**

We also make sure our suppliers are aware of our policies and adhere to the same high standards.

These policies have been developed by our legal, HR, finance and IT teams.

## 4. Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

1. **Suppliers must *fill out questionnaires* which elicit responses on their legal compliance with all applicable legislation;**
2. ***Standard contractual language* regarding a supplier's compliance with all applicable legislation;**
3. **If necessary, *periodic audits* on certain suppliers to ensure compliance.**

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistle-blowers.

## 5. Risk and compliance

We do not consider that we operate in high-risk sectors or locations because of the nature of the services we provide and the location and composition of our suppliers.

We ensure all our suppliers adhere to our Anti-Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies which contain or reflect anti-slavery measures, we will immediately seek to terminate our relationship with the relevant supplier.

## 6. Training

We are raising awareness and continually taking time to invest in educating our staff in order to recognise the risks of modern slavery and human trafficking in our business and supply chains. We have made good progress in this area, rolling out training and this will be repeated for all staff annually (with necessary updates) to ensure we remain vigilant.

## 7. Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: (i) new training videos and instructions for employees and (ii) an updated Anti-Slavery Policy.

This statement is made in accordance with [section 54\(1\)](#) of the Modern Slavery Act 2015 and constitutes the QA Group's slavery and human trafficking statement for the financial year ended 31 May 2024.

This statement was approved by the board of directors of Seckloe 208 Limited.

Signature:

A handwritten signature in black ink, appearing to read 'N. Kinnear', written over a light grey rectangular background.

Seckloe 208 Limited

Date: 1 June 2023

\*Group Companies Covered: QA Limited, QAHE Limited, QA Talent Limited, Circus Street London Limited and each of their individual operating subsidiaries.