Supporting Education Group and Subsidiaries
Modern Slavery Statement

Financial year: 1 December 2024 – 30 November 2025
Approved by the Board of Supporting Education Group on 3rd May 2026.

1. Group Structure, Business and Supply Chains

Supporting Education Group ("SEG") is the parent company of a network of education services businesses incorporated under Hood Topco Limited ("Topco").

SEG operates primarily in the UK education sector, providing a range of services, including professional qualifications, apprenticeships, HR, staffing, payroll, finance support and compliance to multi-academy trusts, schools, nurseries, and local authorities.

Our supply chains include:

- Direct educators (employed or engaged via agencies)
- Secondary labour suppliers introducing educators and apprentices
- Corporate suppliers (e.g. software, office supplies, facilities, strategy consultants)
- Service providers (e.g. payroll, training, IT, catering)

We recognise that the risk profile varies across our supply chain. Indirect labour supply arrangements and certain facilities and service providers (for example cleaning, catering and transport) may present higher inherent risk than our directly employed workforce.

While our operations are UK-based, we recognise that some goods and services may involve extended or overseas supply chains, which can also present increased modern slavery risk.

2. Policies on Slavery, Human Trafficking

SEG maintains a zero-tolerance approach to modern slavery and human trafficking.

This commitment is embedded within our governance framework and supported by policies covering:

- Modern slavery and human trafficking
- Whistleblowing
- Ethical conduct and anti-bribery
- Safeguarding and Child Protection

Our policies apply to our employees and to suppliers and other third parties working with or for SEG. Where appropriate, we communicate our expectations through supplier onboarding, contractual terms, and ongoing supplier management.

Responsibility for oversight of modern slavery risk sits with senior leadership, with escalation routes to executive and Board level where concerns are identified.

3. Due Diligence Processes

We apply due diligence measures that are risk-based and proportionate to our sector and operating model, including:

- Pre-employment and vetting checks: identity, DBS checks, interviews for all educators – face to face where practicable
- Desk and on-site audits with service and goods suppliers flagged as higher risk
- Internal quality audits, including adherence to SEG standards and risk flagged to senior management

In addition, we may require proportionate supplier due diligence, which can include:

- supplier questionnaires or attestations regarding modern slavery controls
- confirmation of policies, training, and right-to-work practices
- verification of relevant insurances and compliance processes
- contractual commitments to comply with applicable law and to notify SEG of any suspected modern slavery concerns

Where issues are identified, we may require corrective action plans and follow-up checks, and we reserve the right to suspend or terminate supplier relationships where appropriate.

4. Risk Assessment and Management

SEG assesses risk in:

- Labour supply chains – especially indirect supplier arrangements
- Corporate and facilities procurement chains (e.g. cleaning, catering, transport)
- Overseas-sourced goods and services

We conduct risk reviews annually, audit where needed, and require supplier attestation or corrective action. During the reporting period, we did not identify any confirmed incidents of modern slavery within our operations or supply chains.

We recognise, however, that the absence of identified incidents does not equate to the absence of risk. Our risk assessment process considers indirect labour supply chains, facilities management and service provision, and goods or services sourced through extended or overseas supply chains. Risk reviews are conducted at least annually and when material changes occur.

We prioritise due diligence activity using a risk-based approach that takes account of factors such as geography, the nature of the labour model (including sub-contracting), the sector, and the extent of oversight available to SEG.

5. Effectiveness and Key Performance Indicators

SEG monitors effectiveness using:

- Staff completion of mandatory modern slavery training
- Supplier confirmation of adherence to our policies
- Reported or alleged incidents of modern slavery
- We monitor effectiveness using a combination of qualitative and quantitative measures and review our KPIs to ensure they remain meaningful and reflective of risk

During FY2025, we achieved:

- 60% staff compliance with annual training
- No confirmed incidents of modern slavery

In addition, we track (where proportionate to risk and contract size):

- Number and proportion of higher-risk suppliers subject to enhanced due diligence and/or audit
- Completion rates for supplier attestations or onboarding confirmations
- Number of concerns raised (including anonymous reports), the time taken to triage/escalate, and the outcomes/actions taken
- Completion and closure rates for any corrective action plans

6. Training and Capacity Building

All staff, including new hires, receive modern slavery training in induction and annually.

Training covers:

- Definition and indicators of slavery and human trafficking
- Policy obligations, escalation channels, and safeguarding
- Specific modules tailored for recruiters, procurement, and senior leaders. We set clear internal targets for training uptake and monitor progress. Training completion is monitored centrally and reported to senior management

We also provide targeted guidance to employees in higher-risk roles (such as recruitment, supplier onboarding, and procurement) on recognising indicators of exploitation and appropriate escalation routes.

7. Continuous Improvement
SEG is committed to continuous improvement in how we identify, assess, and address modern slavery risk.

During the next reporting period, we will:

- Focus on enhancing supplier engagement where proportionate, strengthening visibility of extended supply chains, and refining how we measure and demonstrate effectiveness over time
- Review our supplier onboarding and contract management processes to ensure modern slavery expectations are clearly communicated and evidenced for higher-risk supplier categories

8. Scope and Publication
This statement is made in accordance with Section 54 of the Modern Slavery Act 2015. It applies to Hood Topco Limited and all UK subsidiaries meeting the turnover threshold including Teaching Personnel Limited.

A copy of this statement will be made available in a prominent location on the relevant UK websites of Supporting Education Group (and relevant subsidiaries) and will be reviewed and updated annually.

Caroline Cheale
Group Chief Executive Officer
Supporting Education Group