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To create the world's most accessible
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English Path Global Modern Slavery (Anti-Slavery and Human Trafficking) Policy

Version History

Version	Author	Reviewed by	Pages	Approved by	Date published
2	Dorian Grey	-	5	Sian Matos (Regional Manager)	08.07.2025
1	Dorian Grey	Juliette Synnott - Lee	4	Sian Matos (Regional Manager)	05.09.2023

Introduction

This policy outlines English Path’s zero-tolerance approach to modern slavery and human trafficking. It sets out the responsibilities of staff and partners in identifying, preventing, and reporting exploitation. The policy supports our compliance with the UK Modern Slavery Act 2015 and relevant international accreditation standards.

Translations available. Please ask Student Services.

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1. PURPOSE

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.

English Path has a zero-tolerance approach to modern slavery and we are committed 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 in any of our supply chains.

English Path is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. SCOPE/TO WHOM THIS POLICY APPLIES

This policy applies to all persons working for English Path or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and English Path may amend it at any time.

3. DEFINITIONS

☒ **Contractor:** A company or individual engaged to perform services or supply goods on behalf of English Path.

☒ **Forced Labour:** All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

☒ **Human Trafficking:** The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat or use of force or other forms of coercion, for the purpose of exploitation.



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✘ **Modern Slavery:** An umbrella term encompassing slavery, servitude, forced or compulsory labour, and human trafficking.

✘ **Servitude:** The condition in which the obligation to provide services is imposed by coercion and the person cannot change that condition.

✘ **Supply Chain:** The full range of suppliers and subcontractors involved in the production and delivery of goods and services used by English Path.

4. RESPONSIBILITY FOR POLICY

The Regional Head of Operations have overall responsibility for ensuring the implementation of this policy in collaboration with senior management. The Centre Managers 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 are effective in countering modern slavery.

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

5. COMPLIANCE WITH THIS POLICY

All staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager OR the Head of School as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Head of Operations.

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



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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. English Path 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found in your Staff Handbook.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

English Path may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

8. POLICY REVIEW

This policy will be reviewed annually to ensure continued alignment with applicable international accreditation standards, current legislation, evolving best practices, and the strategic and operational needs of the school.