



Corporate & Social Responsibility Policy

Date:

23rd June 2026

Review date:

22nd June 2027

Approved by:

Rob Grays – Chief Executive Officer

Contents

Introduction	2
Equality and Diversity	2
Anti-human Trafficking, Modern Slavery, Child Labour and Inhumane Treatment	2
Environmental Policy	3
Income Security and Working Hours	3
Protection of Temporary Workers (including transparency of 'take home pay').....	3
Sustainability.....	4
IR35 and ITEPA Legislation.....	4
Supply chain & prompt payment of suppliers	5
Annex A – Equality and Diversity.....	5
Annex B – Modern Slavery, Child Labour and Inhumane Treatment.....	8
Annex C – Anti-Human Trafficking and Slavery Policy.....	9
Annex D – Organisation Structure	10

Definitions

- **Adult at Risk** – any person aged 18 years and over, who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
- **Child** – any person under the age of 18.
- **Client** – an organisation, which engages with Prospero Group to purchase Work-Finding Services. This includes, amongst others: Schools, Local Authorities, Care Homes, Universities, Parents/Carers and Private Sector organisations.
- **Employee** – is defined to mean a full or part-time employee of Prospero Group.
- **Prospero Group** – refers to five brands: Prospero Teaching (including Prospero Children’s Education Services), Prospero Health & Social, Prospero Integrated, Banquo, and Hamnet.
- **Service User** – is defined to mean **Child, Children** or **Adult at Risk**.
- **Supply Chain** – is defined as a network of subordinate or partner recruitment agencies who enable Prospero Group to fulfil its obligations to Clients by sourcing Temporary Workers
- **Temporary Worker** – an individual receiving Work-Finding Services. This includes, amongst others: Teachers, Tutors, Teaching Assistants, Care Assistants, Support Workers and Nurses.
- **Work-Finding Services** – taken to mean recruitment activity, advertising of roles and provision of work-related training, provided by Prospero Group.

Introduction

Prospero’s Corporate and Social Responsibility policy draws its content from a number of Client, Temporary Worker and Employee facing documents. This policy contains a summary of each of the embedded documents, and then links to the most recent version of the original documentation.

Equality and Diversity

Prospero Group Ltd embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

For the Full Policy, please see Annex A – Prospero Group Equality and Diversity Policy of this document.

Anti-human Trafficking, Modern Slavery, Child Labour and Inhumane Treatment

Prospero Group Ltd are a relevant commercial organisation as defined by section 54 (Transparency in supply chains etc”) of the Modern Slavery Act 2015. As a recruitment and training SME, our supply chain is minimal, and primarily UK based. Prospero Group doesn’t utilise sub-contractors to provide our core recruitment services.

Where we require an external company to produce goods or services, we ensure these external companies have a compliant Modern Slavery Policy, we are APSCo registered, which ensures we follow industry best practice.

Our Modern Slavery Policy is publicly available online here: <https://www.prosperoteaching.com/policies-documents>

For full text of the Modern Slavery Policy, please see:

- Annex B - Modern Slave, Child Labour, and Humane Treatments

- Annex C - Anti-Slavery and Human Trafficking Policy

Environmental Policy

Prospero Group Ltd are committed to conducting all business in a responsible, ethical, and sustainable manner.

We recognise that our operations, while primarily office-based, have an environmental impact through energy use, travel, procurement, and waste.

We are dedicated to minimising this impact, supporting the transition to a low-carbon economy, and contributing positively to the communities and environments in which we operate.

Our goal is to embed environmental responsibility into every aspect of our business and to achieve Net Zero carbon emissions by 2040.

Reducing Carbon Production in Identified Key Areas

Prospero are committed to achieving measurable and sustained reductions in carbon emissions across our operations. We identify, monitor, and report our key emission sources in line with the Greenhouse Gas (GHG) Protocol and are guided by the principles of ISO 14001 environmental management.

Our approach includes identifying key emission sources, monitoring performance, and undertaking annual reviews through our ESG Committee to support continual improvement. The following areas have been identified as our primary contributors to carbon emission

To download our annually updated, publicly available Carbon Reduction plan, please visit <https://www.prosperoteaching.com/policies-documents>

Income Security and Working Hours

Prospero primarily operates an umbrella company payment model. This enables our Temporary Workers to choose from an audited PSL of umbrella companies with benefits, perks and prices to suit their requirements. We have introduced a PAYE model, which enables complete payment method flexibility for all Temporary Workers. This guarantees income security and flexibility – including whether Temporary Workers wish to be paid monthly, weekly, inclusive or exclusive of holiday deductions, and other payment choices.

As part of our registration process, Prospero ensures all Temporary Workers sign a Working-time directive declaration. This forms part of their record on our single central CRM.

Protection of Temporary Workers (including transparency of ‘take home pay’)

To ensure that all of our clients are paying the correct contribution under the working time directive, our CRM system has an automated alert that prevents a consultant from booking a Temporary Worker in for a role, where their working hours exceed the limit.

Prospero operates a primarily umbrella company payroll solution, and act as an Work Finding Service on behalf of our Temporary Workers. To ensure that the user is paying the correct WTD, we only work with approved umbrella companies based in the UK. To further promote Transparency of Pay, all Temporary Workers are given an example Key Information Document, which is intended to improve transparency of agency workers, particularly around pay. This enables each Temporary Worker to see what their pay rate, tax rate, any deductions are, and what their “Take Home” pay would be, once they have input their agreed pay rate into our KID Calculator.

Prospero also ensures that all umbrella companies on our PSL, and Prospero Group's PAYE process, must provide a KID summary to each temporary worker. The Key Information Document also ensures that all Temporary Worker pay meets national minimum wage requirements

Sustainability

Promote Employment & Economic Sustainability

As a recruitment agency our focus is on the improvements and opportunity to train staff on our books, Prospero will adopt a local recruitment strategy, with a focus on hiring local staff to support and educate local young people. This contributes to social value, as our dedicated staff work closely with young and vulnerable adults to improve their physical health, mental health and academic attainment and, ultimately, increase their life prospects. Examples include creating apprenticeships, work with schools, and working with recent graduates to attain their career goals and meet their potential.

Raise the living standard of local residents

Prospero will meet with local nominated contract officers on contract award with the aim of brokering a meeting with local collective caring networks. We recognise social economic issues are normally compounded by other social economic issues and sometimes the children and vulnerable adults have additional social and economic barriers to address even before engaging in education.

Promote Participation and Citizen Engagement

We will identify any alternative working opportunities we could generate through our work locally to tie into any parent whose caring responsibilities get in the way of their child's health and education. In addition, we will develop best practice through the local collective caring networks, to understand and support how we can better support and enable local caring individuals to find meaning vocational activity around caring activity.

Promote Environmental Sustainability

Environmental Management: Prospero will work with local environmental agencies to reduce our direct impacts by working with our employees, clients and suppliers. Prospero will make a contribution to communities through volunteering, including the use of our professional skills to support local charities and community groups.

Build capacity and sustainability of the Voluntary and Community Sector

Prospero will open a number of provide additional training and development opportunities to the local workforce. Prospero will offer public facing, fully accredited, free Level 1 Safeguarding course in the education recruitment sector, demonstrating our dedication to creating a safe and educated safeguarding environment for all staff and educators in the UK.

Promote Equity and Fairness

Prospero Group's commitment to Safer Recruitment, across all the sectors we work in, demonstrates our commitment to equity and fairness. All workers on this contract, both in our local supply chain and our local Temporary Workers, will be paid more than the living wage.

IR35 and ITEPA Legislation

Prospero Group IR35 – monitoring, measuring, and reporting

Prospero Group shall ensure that income tax and national insurance are paid through UK PAYE, or any taxation method imposed in succession thereto in line with IR35 Legislation.

We work with several umbrella, PSL and PAYE solution providers. They have all been audited by Prospero Group and independent assessors Professional Passport. We insist upon them completing an HMRC audit questionnaire to be allowed onto our Preferred Supplier List.

The questionnaire asks the umbrella companies about their procedures in terms of monitoring, measuring and reporting on IR35 and AWR. Where umbrella is chosen, workers are fully employed by the Umbrella Company and paid only employment remuneration, meaning PAYE and NICs are deducted on the full extent of their taxable gross. Therefore, no IR35 assessment is required for these workers, as confirmed by HMRCs technical note published on 1st March 2017 (Section 50), which reads "Umbrella Company; Where an umbrella company employs the worker directly and not through an intermediary, the new off-payroll rules do not apply..."

Where a worker chooses to operate via their own limited company, or 'PSC', then the umbrella company will offer an IR35 assessment where they review both the contract, and the working practices in order to provide a professional opinion as to IR35

status. Prospero Group understand that this is really only relevant to the private sector now, as the end client will often dictate IR35 status in the public sector, leading to the use of umbrella or PAYE in most cases.

We report to HMRC on a quarterly basis with a list of workers, their status, pay and tax paid. This is then monitored by HMRC and any shortfall is communicated to us to action.

Internally, our dedicated accounts department, based from our London head office, monitor IR35 compliance across all sectors of the business. We maintain close relationships with umbrella companies on our PSL, holding termly review meetings to ensure continued compliance and improvement.

We actively monitor, measure and report on any issues raised by HMRC, umbrella companies, clients and Temporary Workers.

Supply chain & prompt payment of suppliers

Prospero operates a prompt payment methodology. This is evidenced in our 2026 Company Credit Check. Prospero work closely with our suppliers to ensure consistent communication, clarity on all invoicing and crediting matters, and mutually beneficial relationships.

Partnership organisations who require Prospero Group's full credit check documentation can request this by contacting Invoicequeries Invoicequeries@prosperogrp.com

Credit Check Summary:

(GB) PROSPERO GROUP LTD					UK03662558 Company Number: 04010426	
Risk Score	International Score	Credit Limit	Contract Limit	Status	DBT	Industry DBT
93	A	£3,850,000	£22,000,000	Active	14.61	7

Annex A – Equality and Diversity

Overview

Prospero Group embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

Prospero Group will treat everyone equally and will not discriminate on the grounds of an individual's 'protected characteristics' under the Equality Act 2010 which are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex and Sexual Orientation

We will not discriminate on the grounds of an individual's membership or non-membership of a Trade Union. All staff have an obligation to respect and comply with this policy.

Scope

This policy applies to all members of staff within the Group, irrespective of status or length of service.

About this policy

The Board has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility for this policy, including regular review of this policy, has been delegated to the Managing Director.

All managers must set an appropriate standard behaviour, lead by example, and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.

Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practices. The Managing Director has overall responsibility for equal opportunities training.

If you have any questions about the content or application of this policy, you should contact HR to request training or further information.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting HR.

Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, Temporary Workers, suppliers, and visitors.

This applies in the workplace, outside the workplace (when dealing with clients, Temporary Workers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination: Treating someone less favourably because of a Protected Characteristic. For example, rejecting a job application because of their nationality or on the grounds of sexual orientation.
- Indirect discrimination: A provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them. Harassment is dealt with further in our Dignity at Work Policy.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Employee Complaints Procedure

We aim to resolve any complaints as quickly as possible. All complaints will be treated seriously and confidentially. Only complaints that relate to a breach of this policy should be made using this procedure.

What do I do if I am experiencing discrimination, harassment, or victimisation?

You should consider whether it is appropriate to raise the matter directly with the person concerned in order to resolve the problem. If it is not, you should speak to someone in the HR Department. Following your discussion, you will be asked to choose one of the following options:

- Agree that no further action is necessary.
- Agree to discuss the complaint with the individual who is alleged to have caused the offence.
- Ask Prospero to help resolve the matter through informal and/or discreet approaches; or
- Make a formal written complaint to Prospero.
- If you are not satisfied with an informal approach, a formal complaint can be made at any stage.

Temporary Worker Complaints Procedure

Prospero Group will acknowledge receipt of a complaint in line with the timescales outlined in our Complaints Policy.

The complaint will initially be reviewed and, where a Consultant is involved, it will be referred to them in the first instance to

investigate and attempt to resolve the matter promptly. If the issue cannot be resolved at this stage, or where it is not appropriate for the Consultant to investigate, the complaint will be escalated to a senior member of staff for investigation. Where a Consultant is not involved, the complaint will be assigned directly to a senior member of staff to investigate.

Once an investigating individual has been appointed, the complainant will be informed of who will be handling their complaint. If further information is required, the investigating individual will contact the complainant to request additional details and/or supporting evidence. Once sufficient information and evidence have been gathered, an outcome will be provided to all relevant parties, along with details of any corrective actions, where applicable. If, during the course of the investigation, it becomes apparent that the matter is more serious and meets the threshold for an allegation, it will be referred to one of Prospero Group's Designated Safeguarding Officers and managed in accordance with the Allegations & Misconduct Policy.

Confidentiality will be maintained throughout the complaints process, with information shared only on a strict need-to-know basis to ensure a fair and thorough investigation.

Prospero Group reserves the right to make further enquiries with third parties where necessary, including without consent where lawful and necessary to meet safeguarding obligations.

Recruitment and Selection

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination.

Shortlisting should be done by more than one person and with the involvement of the Managing Director, where possible. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Human Resources Department. For example:

- Questions are necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assignment or any reasonable adjustments that may be needed at the interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check. We are required by law to ensure that all employees are entitled to work in the UK.

Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from UK Visas and Immigration.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure.

Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Training, Promotion and Condition of Service

Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.

Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

Termination of Employment

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory. We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

Breaches of this Policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure.

There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

Related Policies

This policy is supported by the following other policies and procedures

Internal policies, applicable to Employees:

- Grievance Policy
- Disciplinary Policy
- Flexible Working Policy
- Maternity, Paternity, Adoption and Shared Parental Leave Policies
- Parental Leave Policy
- Time Off for Dependants
- Dress Code

Policies Applicable to Temporary Workers:

- Complaints
- Data Protection
- Allegations and Misconduct
- Safer Recruitment

Annex B – Modern Slavery, Child Labour and Inhumane Treatment

Prospero Anti-Slavery Statement

This statement is made pursuant to the requirements of Part six of the Modern Slavery Act 2015 and sets out the steps Prospero has taken and will continue to take in relation to slavery and human trafficking.

This statement sets out the steps taken to try and prevent forced labour and slavery in our supply chain, our own operations and through involvement with our partners.

In line with guidance we aim to make progress over a period of time across a broader range of potential exposures and build a full anti-slavery policy, while in this statement we set out the steps which have been our first priority.

Our Commitment

Prospero Group Holdings Ltd provides work finding services for the regulated and unregulated Health and Social Care sector, the Education sector, and the Audio-Visual Sector. Our organisation structure can be found in Annex D.

We recognise that modern slavery is a significant global rights issue and includes human trafficking, forced and bonded labour, child labour, domestic servitude, and sex trafficking.

We are committed to protecting and respecting human rights and have zero tolerance approach to slavery and human trafficking in all its forms.

We will act ethically and with integrity in all our relationships, and use all reasonable endeavours to take action directly and to influence others to ensure slavery and human trafficking is not taking place, wherever we can do so.

Our Human Resources policies set out our commitment to workplace rights at Prospero, our Equality & Diversity policy promotes an enabling and inclusive environment in which all members of the Prospero staff community are treated with dignity and respect.

We have well established procurement protocols which sets out our principles and practices for staff in acquiring goods, services and works, and outlines the steps we take to ensure the adoption of an ethical procurement approach with our supply chain and partners.

Preventing modern slavery on our premises

We are vigorous in checking that Employees and Temporary Workers have the right to work in the UK, and where agency workers are used, Prospero engage with agencies that have been through a procurement process prior to appointment to the supplier list to ensure adherence to the Act.

The Finance and Purchasing training for new staff raises awareness for staff on the Act, Prospero will continue to raise awareness among staff and stakeholders through a wide range of events, and where required with training.

Ethics Code

Prospero operates within a published ethics code that applies to all staff, and all external parties acting on behalf of Prospero. All parties have an individual responsibility (and in the case of external parties often a corporate responsibility) to uphold the principles, which have been approved by the Prospero Board. We will continue, to promote ethical behaviour and conduct by continuing to raise awareness with all stakeholders.

Potential risk areas in our supply chain

We identified high risk areas, for which the supplier's Modern Slavery statement is reviewed and all new suppliers make a declaration of their awareness and adherence to the Modern Slavery Act. Prospero will continue to get a better understanding of the supply chain, and will monitor those supply chains that have been identified as a potential risk and take appropriate action where necessary.

Compliance to the Act is incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of Prospero's terms and conditions. We will continue to risk assess the supplier base, to target the awareness and adherence of the Act.

Contractual terms and conditions (Including Supply Chains)

The core principles of the Act, are underpinned by Prospero's terms and conditions and in all contractual terms adopted. The standard terms and conditions are applied to all companies, and where ever possible we ensure that our terms and conditions are used, but in instances where a supplier's terms are used or a specific contract is required, Prospero will conduct a full review to ensure that these principles are adhered to in full.

In most cases Prospero seeks to engage, improve, highlight and recognise our responsibility to support the identification, mitigation and eradication of modern slavery in our supply chain or with partners.

This statement has been reviewed by the Prospero Board, and will continue to be reviewed annually.

Annex C – Anti-Human Trafficking and Slavery Policy

Introduction

This policy sets out the steps taken by Prospero Group to prevent modern slavery and human trafficking in its business and supply chains, as per the requirements of the Modern Slavery Act 2015. Prospero Group Holdings Ltd provides work finding services for the regulated and unregulated Health and Social Care sector, the Education sector, and the Audio-Visual Sector. Our organisation structure can be found in Annex D.

Scope

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

Definitions

For the purposes of this policy, 'slavery', 'human trafficking', 'forced labour', and 'child labour' are defined as per the Modern Slavery Act 2015 and other relevant laws.

Policy Statement

Prospero Group has a zero-tolerance approach to slavery and human trafficking. 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 slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

Responsibilities

All individuals to whom this policy applies are required to read, understand and comply with this policy, and to avoid any activity that might lead to a breach of it. Any suspected breach of this policy should be reported to the as per the guidelines set out in the Reporting section of this policy.

Training and Awareness

Prospero Group will provide training to staff to help them understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain.

Reporting

Any suspicions of slavery or human trafficking should be reported immediately to the Head of Compliance and Safeguarding. Reports can be made confidentially, and reporters will be protected from retaliation.

Actions and Remedies

Any employee who breaches this policy will face disciplinary action, up to and including termination of employment. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Monitoring and Review

This policy will be regularly reviewed and updated as necessary. The board of directors have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

References

This policy is based on the Modern Slavery Act 2015 and other relevant UK and internal laws.

Annex D – Organisation Structure

