

# Modern Slavery and Human Trafficking Policy

Version 1.0

Policy owner: Matt Brown, Director

Effective date: 19 October 2026

Next review: 19 October 2027, or sooner if required

## Purpose and scope

Dunbar Education Ltd is committed to preventing modern slavery, human trafficking, forced labour and exploitation in its business and supply chains. This policy applies to directors, employees and anyone acting on our behalf. We expect suppliers and business partners to uphold the same standards.

We recruit and supply temporary and permanent staff to the education sector. This policy covers our treatment of our own staff and supplied workers, and our relationships with payroll providers, recruitment partners and other suppliers.

## Our standards

Work must be freely chosen. Workers must be free to leave employment or an assignment in accordance with lawful contractual arrangements. We do not charge work seekers recruitment fees for finding them work. Any optional service must be lawful, transparent and genuinely optional.

We do not retain original identity documents to restrict a person's freedom, or permit threats, coercion, debt bondage or restrictions on movement. Pay, deductions and working arrangements must be transparent and lawful. Workers must receive the applicable statutory minimum wage and other employment entitlements. Concerns must be taken seriously. No person should suffer retaliation for raising a concern honestly, even if it is not subsequently substantiated.

## Responsibilities

Directors oversee this policy; decide how serious concerns are escalated and approve the annual statement. Matt Brown is the named contact for modern slavery concerns.

The Compliance Team oversees relevant candidate checks and escalates warning signs. Staff responsible for selecting suppliers must consider exploitation risks before appointment and when concerns arise. All staff must follow this policy and report concerns promptly.

## Recognising risks

Warning signs may include someone speaking for a worker or controlling their documents, money or travel; unexplained deductions or recruitment debts; fear of an employer or intermediary; inability to speak privately; or several unrelated workers sharing contact or bank details without a credible explanation. A warning sign is a reason for sensitive enquiry, not proof of exploitation.

## Recruitment and supplier checks

We will apply checks proportionate to the risks in each relationship, with particular attention to recruitment intermediaries, third-party payroll arrangements and workers who may be vulnerable to exploitation.

Verify identity and right to work through the appropriate process, giving workers a reasonable opportunity to communicate directly and privately.

Explain relevant pay arrangements, terms and deductions clearly, and investigate concerns about withheld wages or unexpected charges.

Check the identity and legitimacy of relevant suppliers and review their approach to worker protection where appropriate.

Escalate unexplained third-party control of worker communications, documents or payments before proceeding.

Review suppliers when credible concerns arise and seek corrective action, suspend use or end the relationship where appropriate.

Membership of an industry body may support due diligence but does not replace assessment of the supplier's actual practices.

### **Reporting and responding**

Report concerns promptly to Matt Brown, Director, in person or through the usual company contact channels. If the concern involves Matt, report it to another director. Staff may also use the Whistleblowing Policy. If someone is in immediate danger, contact the emergency services on 999.

Staff should record factual observations, preserve relevant information securely and avoid confronting a suspected exploiter or taking action that could put someone at risk. Do not promise absolute confidentiality; information may need to be shared to protect people or meet legal obligations.

A director will assess the concern promptly, consider immediate safeguarding measures and arrange proportionate enquiries. Where appropriate, we will seek specialist advice and refer information to the police or other relevant authorities. We will consider the affected person's safety and welfare when deciding whether to suspend or end a supplier relationship.

### **Training and monitoring**

We will provide staff with role-appropriate awareness information and support, including warning signs, reporting routes and the risks associated with recruitment and payroll arrangements. Managers and compliance staff will receive additional guidance where their responsibilities require it.

Directors and the Compliance Team will review concerns raised, actions taken, relevant payroll discrepancies, supplier issues and staff awareness activity. Findings will inform changes to checks, training and supplier arrangements. Records will be handled securely in accordance with data protection requirements.

### **Review and approval**

This policy will be reviewed annually and earlier if there are material changes to our business, legal requirements or identified risks. It should be read alongside our safeguarding and whistleblowing policies.

### **Modern Slavery and Human Trafficking Statement**

Dunbar Education Ltd

Reporting period: 1 September 2025 to 31 August 2026

Publication date: 19 October 2026

**Our commitment and business**

Dunbar Education Ltd recruits and supplies temporary and permanent staff to the education sector in the United Kingdom. We are committed to preventing modern slavery and human trafficking in our operations and supply chains.

This statement describes our approach to managing those risks. It is published voluntarily in support of the principles of section 54 of the Modern Slavery Act 2015 and our supplier commitments.

**Our supply chains and risks**

Our supply chains include suppliers supporting recruitment, payroll, technology and office operations, and recruitment partners where used. Potential risks include exploitation through intermediaries, coercion of workers, recruitment debts, unlawful deductions and third-party control of workers' documents or earnings.

**Policies and due diligence**

Our Modern Slavery and Human Trafficking Policy sets out expected standards and escalation routes. Our whistleblowing and safeguarding policies provide related reporting arrangements.

During the reporting period, our approach included candidate compliance checks, review of internal and external payroll arrangements, and encouraging staff to raise concerns with management. Directors and the Compliance Team oversee the investigation and escalation of relevant concerns.

**Awareness and monitoring**

Staff receive awareness information and support appropriate to their role, alongside safeguarding training. We review relevant compliance and payroll concerns and the action taken in response to supplier issues to identify improvements.

**Priorities for the next reporting period**

We will review supplier risks, reinforce staff awareness of exploitation warning signs and reporting routes, and improve records of checks, concerns and follow-up actions. We will review our policy and statement annually.

**Approval and signature**

This statement was approved by the Board of Directors of Dunbar Education Ltd on 19 October 2026 and signed on its behalf by Matt Brown, Director.

Signed: *Matt Brown*

Name: Matt Brown

Date: 19<sup>th</sup> October 2026