

# Dunbar Education – Modern Slavery Policy

Date of Policy: 28/06/2024

Policy Review Date: 04/09/2025

Next Review Date: 03/09/2026

## Modern Slavery Policy

Dunbar Education is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.

Dunbar Education is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

Dunbar Education provides appropriate awareness information for all of its staff.

Any staff, workers, or other parties are strongly encouraged to report any concerns or suspicions that they might have to our Director, Matt Brown.

Reports surrounding these issues are taken extremely seriously by our directors, who are committed to ensuring that all investigations are prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards
- Removing that organisation from our preferred supplier list
- Passing details to the appropriate law enforcement bodies

We regularly monitor our risks in this area using relevant key performance indicators, including:

- Our Directors and HR are responsible for creating, renewing, and reviewing policies on an annual basis.
- Our Directors and HR are responsible for risk assessments in respect of human rights and reviewing business activity.
- Our Directors are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

As part of our efforts in this area, we publish a modern slavery statement on an annual basis.

We would also recommend reading this in conjunction with our other policies, including our Whistle-blowing policy.

This policy was adopted on 25/03/21 after being agreed by our Directors. It is reviewed every August.

## Modern Slavery Statement

### Overview

This statement is made as part of Dunbar Education's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Dunbar Education operates, the policies and processes in place to minimise the possibility of any problems/risks we have identified, and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act and relates to the financial year April 6th 2025 to April 5th 2026. It was approved by our Director, Matt Brown.

### Our Business

Dunbar Education is a limited company operating in the recruitment sector. We supply temporary and permanent workers in the Education sector.

Dunbar Education is an independent business.

### Who we work with

As a "master vendor", we work with other businesses to supply workers to hiring companies. We hire some of the workers directly, who are recruited by our staff. Other workers are hired directly by other businesses. We facilitate supplying a mix of these workers to the hiring companies.

The hiring companies that we work with are located in and around London, along with the home counties. The candidates we supply live in London and throughout the home counties.

### Other relationships

As part of our business, we also work with the following organisations:

- APSCo – United Kingdom

### Our Policies

#### Policy development and review

Dunbar Education's policies are established by its Directors based on advice from HR professionals, industry best practice, and legal advice. We review our policies annually or as needed to adapt to changes.

### Our Processes for Managing Risk

To assess the risk of modern slavery, we use the following processes with our suppliers:

- We review the potential for risk at regular intervals.

After due consideration, we have identified the following potential risks in our supply chain:

- Sector-specific risks

Additionally, we have taken the following steps to minimise the possibility of any problems:

- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management, where reports will be treated with confidentiality.

## Our Performance

As part of monitoring the performance of Dunbar Education, we track the following general key performance indicators:

- In-depth compliance checks

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our Directors and Compliance Team.

- The effectiveness of enforcement against suppliers who breach policies
- Review of our internal and external payroll, to ensure our employee and candidate salaries are above the national living wage

We carefully consider our indicators to ensure that we do not put undue pressure on our suppliers that might increase the potential of risk.

## Our Training

All our staff receive training and support that is appropriate to their role. In particular:

- Our leadership receives advice in identifying and resolving concerns around modern slavery and human trafficking.
- All of our staff receive awareness around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have.

Staff also receive training on safeguarding. They are encouraged to follow the correct procedure to report any safeguarding concerns. Please refer to the safeguarding training policy.