Modern Slavery Act Policy 2022

Introduction and Statement

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 to exploit them for personal or commercial gain. Pass Move Grin Education has a zero-tolerance to modern slavery. We are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in PMG's own business. Pass Move Grin Education is also committed to ensuring transparency in business and expects the same high standards from all contractors, suppliers and other business partners. This policy is being implemented to ensure that we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment 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.

Pass Move Grin Education is a limited company operating in the recruitment sector. All of the hirers that we work with, and all of the work-seekers we provide, are known to and identified by our staff. All of the temporary workers we supply are identified by our staff, and have been met in face to face interviews. Because we work in the education sector, vetting checks are of the utmost importance and we have very high standards for our background and identity checks. Some of our work-seekers are supplied via other businesses, who facilitate providing them to the eventual hiring company. The hiring companies that we work with are in the main local authority and schools throughout Nottinghamshire. The workers we supply live in Nottinghamshire. We maintain close relationships with suppliers of services and goods not for resale. Where risks are highlighted, or concerns are raised the suppliers are assessed remotely and through face to face or online meetings to ensure they are effectively managing the risk of modern slavery in their businesses.

Pass Move Grin Education's policies demonstrate the company's dedication to acting ethically and with integrity. Our policies incorporate ethical standards for our staff with directors and senior management setting the tone from the top. Protocol Education wishes to create an open, supportive and safe working environment where everyone feels able to speak up and voice any concerns they may have. Policies on modern slavery, anti-bribery and whistleblowing are widely available to staff, work seekers and temporary workers through the company's intranet and policies provided.

Policy development and review: Protocol Education's policies are established by the head of Pass Move Grin Education. We review our policies on a regular basis, or as needed to adapt to changes.

Due diligence processes: Our most important asset is our people and we are committed to providing a safe, fair and supportive working environment where employees can thrive. Internal audit processes are undertaken throughout the year to monitor adherence to the Quality Charters and Standards, which are regularly communicated within the business.

Our Processes for Risk Assessment and Management

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

• We review the potential for risk at regular intervals, including the possibility of auditing a supplier or requesting confirmation of policies and process.

We have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

Our staff are encouraged to bring any concerns they have to the attention of management.

Our Performance

As part of monitoring the performance of Protocol Education, and based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our board of directors:

- the level of modern slavery training and awareness amongst our staff
- reports of possible incidents of Modern Slavery

There have been no reports of incidents of modern slavery in the financial year 2022-23.

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

Our Training

All our staff receive training and support that is appropriate to their role. Training on Modern Slavery is made available to all staff and accessible at all times, alongside appropriate guidance as required. The company is committed to creating a safe, fair and inclusive environment and its learning and development offer is underpinned by this ethos.