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## Modern Slavery Statement

Modern Slavery is a crime and a violation of human rights but in the UK and abroad these violations continue to be reported in relation to business.

Protocol Education is committed to eliminating modern slavery and to ensuring that our staff and any workers we supply directly or indirectly are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour or similar human rights abuses.

This statement is made as part of Protocol Education's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Protocol Education Limited (PE) operates, the policies and processes in place to minimise the possibility of any problems, any 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 1 December 2017 to 30 November 2018. It was approved by the board of directors on 30th May 2019.

John Bowman  
CEO

## **1. Our Business**

Protocol Education is a limited company operating in the recruitment sector. We supply temporary workers in the education sector.

Protocol Education is part of the wider Supporting Education group, whose ultimate holding company is Arthur Topco Limited. For details of our group structure, see [www.supportingeducation.com](http://www.supportingeducation.com).

### **1.1 Who we work with**

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 a face to face interview. Some of these work-seekers operate through their own limited companies. 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 independent schools, private nurseries and located throughout England. The workers we supply live throughout England and Wales.

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 meetings to ensure they are effectively managing the risk of modern slavery in their businesses.

### **1.2 Other relationships**

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

- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com)) and the Institute of Recruitment Professionals ([www.rec-irp.uk.com](http://www.rec-irp.uk.com))

## **2. Our Policies**

Protocol 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.

### **2.1 Policy development and review**

Protocol Education's policies are established by our directors and senior management, based on advice from HR professionals, industry best practice and legal advice. We review our policies on a regular basis, or as needed to adapt to changes.

## **3. Due diligence processes**

Our most important asset is our people and Protocol Education is 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.

## **4. 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.

## **5. 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 financial year 2018. 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.

## 6. Our Training

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

- Our recruiters, HR personnel, and staff involved in our procurement and supply chains undertake training courses that include guidance around modern slavery and human trafficking.
- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.



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