

Modern Slavery Policy



1. Aquinas Education Ltd is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses.
2. Aquinas Education Ltd 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.
3. Aquinas Education Ltd provides appropriate training and awareness information for all of its staff.
In particular:
 - 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.
4. Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to Compliance Manager.
5. Reports surrounding these issues are taken extremely seriously by our senior leadership team, who are committed to ensuring that all investigations shall be 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 appropriate law enforcement bodies.
6. We regularly monitor our risks in this area through the use of relevant key performance indicators, including:
 - The effectiveness of enforcement against suppliers who breach policies,
 - The amount of time spent on audits, re-audits, spot checks, and related due diligence, and
 - The level of modern slavery training and awareness amongst our staff.
7. As part of our efforts in this area, we publish a modern slavery statement on an annual basis.
8. We would also recommend reading this in conjunction with our other policies, including our:
 - Anti-bribery / corruption policy, and
 - Whistle-blowing policy.

This policy was adopted on 26/04/2023 after being agreed by our board of directors. It is reviewed annually.

Modern Slavery Statement



This statement is made as part of Aquinas Education's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Aquinas 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 Jan 2023 to Jan 2024. It was approved by the board of directors on 26/04/2023.

Nicola Anderson

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Compliance Manager

1 Our Business

Aquinas Education Ltd is a limited company operating in the recruitment sector. We supply temporary workers in the Education sector.

Aquinas Education Ltd is an independent business.

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. We do not supply work-seekers to hiring companies through any intermediaries.

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)

2 Our Policies

Aquinas Education Ltd has a modern slavery policy available at www.aquinaseducation.com.

In addition, Aquinas has the following policies which incorporate ethical standards for our staff.

- Equal opportunities and diversity Policy
- Customer service Policy

- **Data protection Policy**
- **Safeguarding and Safer recruitment Policy**
- **Whistleblowing Policy**

2.1 Policy development and review

Aquinas' policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice. We review our policies annually, or as needed to adapt to changes.

3 Our Processes for Managing Risk

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

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.

After due consideration, 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.

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

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to abide by our code of supplier conduct

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

4 Our Performance

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

- Evidence of a workplace being used for accommodation
- Workers distrustful of authorities
- Untreated trauma
- Signs of substance misuse

Based on the potential risks we have identified, we have also established the following key performance indicators, which are regularly assessed by our senior leadership team:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements

- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

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.

5 Our Training

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

- 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.

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

Training is refreshed annually.

