

## Modern Slavery Statement

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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.

Step Teachers 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, force labour or similar human rights abuses.

This statement is made as part of Step Teachers commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summaries how Step Teachers Ltd 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<sup>st</sup> August 2021 to 31<sup>st</sup> July 2022. It was approved by the board of directors on 7<sup>th</sup> July 2023.

### 1 Our Business

Step Teachers Ltd is a limited company operating in the recruitment sector. We provide introduction services and supply temporary teachers and support staff in the Education Recruitment sector. Step Teachers Ltd is an independent business.

Our business is sourcing, vetting and introducing to schools, qualified teachers and support staff; both for permanent and temporary positions. Step Teachers Ltd maintain that the risk of modern slavery and human trafficking in the Education Recruitment Sector as limited given:

- The comprehensive nature of vetting required prior to any teachers and or support staff being placed.
- The broader sector regulations including the Conduct of Employment Agencies and Employment Business Regulations 2003 (as amended) and the Agency Workers Regulations 2010).
- The qualification levels of the teachers and or support staff supplied.

#### 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.

The hiring companies that we work with are local authority schools and private nurseries and located in the south of England. The work-seekers / workers we supply live in the south of England.

#### 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

Step Teachers Ltd has a Modern Slavery Policy available in our Employee Handbook. Step Teachers Ltd is absolutely committed to preventing slavery and human trafficking in its corporate activities and operates a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

In addition, Step Teachers Ltd has the following policies which incorporate ethical standards for our staff.

- our values, which are embedded throughout our business, set the framework for how we expect our people to behave with colleagues, clients and the world at large
- we seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted
- our policies and procedures relating to the Modern Slavery Act are in line with our culture and values

### 2.1 Policy development and review

Step Teachers Ltd's policies are established by our senior leadership team, based on advice from HR professionals, industry best practice and legal advice, and in consultation with our shareholders. We review our policies on a regular basis, 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:

- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

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:

- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.

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 Step Teachers Ltd, we track the following general key performance indicators:

- We have KPI to monitor the performance of our Compliance Team when processing work-seekers application forms – we perform checks which include but are not limited to, DBS Criminal Background Check as well as Overseas Police Checks, Original Identification and Qualification Checks, Work Permit & Visa Checks and References. By monitoring the performance of our Compliance Team and setting KPIs we ensure that all Applications meet the REC's Education Audit best practice standards and eliminate the possibility of any potential modern slavery risks.

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:

- Conduct strict identity, right to work, qualification, referencing, police checks and other vetting checks on all teachers and support staff who register with Step Teachers Ltd in order to find work and in addition to all internally employed staff
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- identify and assess potential risk areas in our supply chains
- ensure the education establishments to which we supply staff have suitable anti-slavery and human trafficking policies and processes in place
- monitor the working conditions, hours of work and pay of our teachers and support staff
- the level of modern slavery training and awareness amongst our staff; to encourage the reporting of concerns and the protection of whistle blowers

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:

- Our leadership team receive detailed training in identifying and resolving concerns around modern slavery and human trafficking.

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