



## MODERN SLAVERY POLICY

Date of policy: 22/07/2025

This policy will be reviewed every 12 months (as a minimum)

Review Date: 22/07/2026

### Policy Statement

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 Act and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by Parker Smith Inclusion, to prevent modern slavery and human trafficking in its business and supply chain.

Parker Smith Inclusion fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognises the significant role we can play in both combatting it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

We recognise that being in the Parker Smith Inclusion industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector. We are committed to monitoring such risks in our business and in our wider supply chain and to mitigating them.

Parker Smith Inclusion has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### About the organisation

Parker Smith Inclusion is a privately-owned company registered in England and Wales. The Company is carrying on business in the UK as a SEND Education Recruitment Consultancy specialising in recruiting for SEN schools, Alternative provisions, PRU’s and mainstream schools. This includes but is not limited to Support staff, Teachers, Occupational Therapists, SaLTs etc.

### Policy Scope

This policy applies to all persons working for Parker Smith Inclusion or on its behalf in any capacity, including employees at all levels, directors and officers and third parties including agency workers, customers, suppliers seconded workers, volunteers, interns, agents, contractors and external consultants.

### Purpose of the Policy

This policy describes how the Company will prevent, detect and report modern slavery in any part of its business or supply chains.

### Our policies on Modern Slavery including Human Trafficking:

- Whistleblowing Policy
- Equality, Diversity and Inclusion
- Anti-Bribery & Corruption
- Corporate & Social Responsibility
- Procurement Policy
- Complaints Policy



#### Parker Smith Inclusion Ltd

**London:** 14 New Street, London EC2M 4HE **Essex:** Create Business Hub, 5 Rayleigh Road, Brentwood CM13 1AB

**T:** 020 3011 4848 **E:** hello@psinclusion.co.uk **W:** psinclusion.co.uk

**Registered in England & Wales No:** 13184803 **VAT No:** 374567657



## Our People

Parker Smith Inclusion have in place robust recruitment and screening processes for new employees to ensure that we do not inadvertently employ anyone who might fall within the scope of the Act. Our recruitment processes comply with UK employment and regulatory laws. We ensure that new recruits are eligible to work in the UK and we carry out due diligence and background checks. All employees are paid above the National Living Wage and provided with an employment contract, and we periodically benchmark our salaries and benefits to ensure they remain competitive.

## Whistleblowing

Our whistleblowing policy sets out our commitment to ensure people are free to question things and raise anything they are concerned about and specifically modern slavery and human trafficking. We encourage people to speak up by raising matters with Keya McKenzie, Compliance and HR Manager, at Parker Smith Inclusion.

## Procurement and our supply chain

Parker Smith Inclusion suppliers are an important part of our success and our culture. We expect each business partner to conduct their business with the same commitment to ethical business practices as Parker Smith Inclusion. We conduct due diligence on all suppliers before allowing them to become part of our supply chain. This includes:

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.
- Our onboarding process requires us to vet in accordance with relevant legislation and regulations, with assurance required through evidence that the supply chain does not promote or take part in Modern Slavery activities

## Due Diligence Processes

We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers. Our due diligence processes include:

- Mapping the supply chain to assess particular product or geographical risks.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments. High-risk suppliers are subject to more frequent audits and required to demonstrate steps taken to improve their practices.
- Taking steps to improve substandard suppliers' practices.

## Risk Assessment

We regularly assess potential risk areas in our supply chains and operations, considering:

- Geographical risk
- Sector risk
- Transaction risk
- Business partnership risk

## Training and Awareness

We provide training as part of the induction process to all employees to ensure a high level of understanding on the risk our business faces from modern slavery and human trafficking in our supply chains and our business. We provide updated training as necessary, via our Bright HR Peninsula Hub.

## Further steps

We will continue to monitor our supplier base and to further develop our processes and procedures to ensure that we identify and eliminate risks related to slavery and human trafficking.



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We will continue to enhance the training that we provide to relevant staff.

We are continuing to review the way we do business with third parties through our corporate sustainability strategy. This involves a deeper exploration into the environmental and social standard our suppliers work within and the governance that oversees them.

We will continue to support all staff to understand and respond to modern slavery and human trafficking, and the impact that each, and every individual working in the [include sector name] sector can have in keeping present and potential future victims of modern slavery and human trafficking safe.

This policy has been approved by the organisation’s Directors who will review and update it annually.

REVIEW DATES	
Author	Keya Mckenzie
Version	1
Director Sign Off	Darragh Ryan
Date	22/07/2025