

# Modern Slavery and Human Trafficking Statement

Keystage Education LTD | Version 1.0 | Reviewed August 2026 | Next review August 2027

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Keystage Education LTD has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity, and to ensuring that slavery and trafficking are not taking place in our business or our supply chain.

Recruitment is a recognised high-risk sector. Labour exploitation usually reaches the workplace through an intermediary, and agencies are the point at which it can most effectively be detected — or overlooked. We take that responsibility seriously.

## Our position on section 54

Section 54 of the Modern Slavery Act 2015 requires organisations with a turnover of £36 million or more to publish an annual statement. Keystage Education LTD is below that threshold and is not legally required to publish one. We publish this statement voluntarily, because the underlying risk applies to us regardless of turnover and because our clients are entitled to know what we do about it.

## Warning signs we look for

- a third party who speaks for a candidate, attends appointments with them, or answers on their behalf;
- the same bank account, address, telephone number or email used by several unconnected candidates;
- a candidate who does not control their own identity documents;
- a candidate who does not know their own address, pay rate or who employs them;
- signs of fear, withdrawal, injury or reluctance to speak alone;
- unusual availability at any hour, and never refusing work;
- pay directed to an account in someone else's name;
- unexplained deductions, fees or debts owed to a third party.

## What we do about it

- Every candidate is met and their identity verified in person or through a certified digital provider. This is our single most effective control.

- We speak to every candidate alone at least once during registration, and will not register anyone who is never permitted to speak for themselves.
- We pay only into an account in the candidate’s own name, or to an approved umbrella company employing them.
- We never charge a work-finding fee, and we tell every candidate that any demand for one is unlawful and should be reported to us.
- We give every candidate our contact details directly, in writing, so they can reach us independently of anyone else.
- We check that the National Minimum Wage is met on every assignment.
- Umbrella companies and suppliers are approved before use, subject to due diligence on ownership, pay practices and deductions, and reviewed at least annually.
- Our terms give us the right to audit and to terminate immediately for a breach of anti-slavery obligations.
- Internal staff receive modern slavery awareness training at induction and annually.

### Reporting a concern

If you suspect a candidate is being exploited, do not confront the suspected exploiter and do not raise it with the candidate in front of anyone else. Approaching the wrong person can put the victim at greater risk. Report it to the Director immediately.

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|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <b>Internally</b>                                   | Abdullah Iqrar, Director — <a href="mailto:abdullah@keystage-education.co.uk">abdullah@keystage-education.co.uk</a> — 0208 057 9509 |
| <b>Modern Slavery Helpline (24/7, confidential)</b> | 08000 121 700                                                                                                                       |
| <b>Gangmasters and Labour Abuse Authority</b>       | 0800 432 0804                                                                                                                       |
| <b>Police</b>                                       | 999 in an emergency, otherwise 101                                                                                                  |

Where we identify a potential victim we will consider a referral to the National Referral Mechanism, with the individual’s consent where they are an adult. A referral must be made where the potential victim is a child. We will not withdraw work or registration because someone has been identified as a potential victim.

*This statement is approved by the Director and reviewed annually. Our full Anti-Slavery and Human Trafficking Policy is available on request.*