TEACHERSDESK LTD

Modern Slavery and Ethical Labour Policy

Preventing exploitation across recruitment, assignments and supply chains

Document owner	Director / Compliance Officer
Approved by	Ilkan Pasa, Director
Version	1.1
Effective date	Date of signature
Review date	Within 12 months of approval, or sooner if required
Applies to	Employees, candidates, workers, contractors, suppliers and associated persons
Status	Approved

1. Policy statement

TeachersDesk Ltd has zero tolerance for modern slavery, human trafficking, forced labour, servitude, debt bondage, child labour, unlawful recruitment fees, coercion or any other form of labour exploitation.

The Company is committed to acting ethically and transparently and to taking proportionate steps to identify, prevent, report and address modern slavery risks in its recruitment activities, assignments and supply chain.

2. Scope

This policy applies to:

- directors, employees, temporary workers, candidates, contractors and consultants;
- suppliers, subcontractors, introducers, payroll or technology providers and other associated persons;
- all recruitment, onboarding, placement, payroll and supplier-management activity;
- all work carried out in the UK or overseas; and
- all education customers, schools, academy trusts and public-sector contract arrangements.

3. Definitions

Term	Meaning
Modern slavery	An umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking.
Forced labour	Work or service extracted under threat, coercion, deception, abuse of vulnerability or restriction of freedom.
Human trafficking	Arranging or facilitating a person's travel or movement for the purpose of exploitation.
Debt bondage	Labour demanded as repayment of a debt where the terms are abusive, unclear or prevent freedom to leave.
Child labour	Work by a child that is unlawful, harmful, exploitative or interferes with education and development.
Recruitment fees	Fees or charges imposed on a work-seeker for obtaining work where prohibited or exploitative.

4. Our commitments

TeachersDesk Ltd will:

- not knowingly engage with any person or organisation involved in modern slavery or exploitation;
- provide work-finding services to education candidates without charging them a fee;
- not retain passports, identity documents, bank cards or personal property as a condition of work;
- not restrict a worker's freedom to leave an assignment or end an engagement in accordance with lawful terms;
- pay workers accurately and through legitimate, traceable payment arrangements;

- provide clear information about pay, deductions, holiday pay, hours and assignment terms;
- carry out proportionate due diligence on material suppliers and associated persons;
- investigate concerns promptly and protect persons who report them in good faith;
- cooperate with customers, regulators and law-enforcement bodies where required; and
- review and improve controls where risks or incidents are identified.

5. Candidate and worker protections

Candidates and workers must be treated fairly, with dignity and without coercion, intimidation or deception.

TeachersDesk Ltd will seek to ensure that:

- work is freely chosen;
- terms are explained before an assignment begins;
- pay rates and lawful deductions are transparent;
- workers are paid into an account that belongs to them, unless a lawful and verified alternative is necessary;
- workers keep control of their identity documents and personal property;
- workers may raise concerns without fear of retaliation;
- no person is threatened with immigration, criminal or employment consequences to force them to work; and
- any indication of control by a third party is assessed promptly.

6. Recruitment fees and deductions

TeachersDesk Ltd does not charge education candidates a fee for finding them work. Any separately offered optional service or lawful deduction must be explained in advance and documented. Registration, placement and continued work must be available without buying an optional service.

No employee, introducer, supplier or associated person may request cash, gifts, commission or personal payment from a candidate in exchange for registration, work, faster onboarding, preferred placement or continued assignments.

7. Identity documents and freedom of movement

Original identity and right-to-work documents may be inspected for lawful verification but must be returned promptly. TeachersDesk Ltd will not retain original passports, visas, biometric documents, bank cards or other personal property.

A worker must not be prevented from leaving premises, contacting family, accessing their own money or ending work in accordance with lawful arrangements.

8. Pay, payroll and working arrangements

For Framework supply assignments, TeachersDesk Ltd will use its own PAYE payroll. We will reconcile school-approved timesheets with agreed pay and assignment terms. To help identify exploitation and resolve discrepancies, we will maintain the following controls:

- accurate timesheets and invoices;
- clear pay rates and holiday-pay information;

- lawful tax, National Insurance and pension arrangements;
- verification of bank details and unusual changes;
- prompt investigation of withheld wages or unexplained deductions;
- monitoring for excessive or unsafe working hours where relevant; and
- clear routes for workers to query pay or report pressure from another person.

9. Supply-chain due diligence

TeachersDesk Ltd will assess suppliers and intermediaries before engagement and review them according to risk. The assessment will consider labour arrangements, control of identity documents and pay, and exposure to recruitment fees or coercion. The Director / Compliance Officer will record evidence, unresolved risks, actions and a review date.

Due diligence may include:

- verifying identity, ownership and business legitimacy;
- reviewing labour, modern slavery and ethical standards;
- checking payment structures and use of intermediaries;
- considering geographic, sector and workforce vulnerabilities;
- reviewing adverse information, complaints or regulatory action;
- requiring contractual compliance with applicable law and this policy; and
- seeking evidence or assurances where a higher risk is identified.

10. Higher-risk indicators

Warning signs may include:

- a worker appears frightened, controlled or unable to speak freely;
- another person controls the worker's documents, bank account, telephone or communication;
- the worker does not know their address, rate of pay or contractual terms;
- multiple workers use the same unexplained bank account, address, telephone number or controlling contact;
- a worker reports debt, threats, withheld wages or pressure to work;
- documents appear false, altered or held by a third party;
- a supplier refuses transparency about its workforce, ownership or pay practices;
- unexplained recruitment charges or deductions are imposed;
- workers are transported or housed in unsafe or coercive circumstances; or
- a person cannot leave work or accommodation freely.

11. Education-sector considerations

Modern slavery concerns may also create safeguarding risks. Where a candidate, worker, pupil, family member or other person may be at risk, TeachersDesk Ltd will consider whether the concern must be reported through the relevant school's safeguarding process, local authority, police or another statutory route.

No safeguarding or emergency report should be delayed while an internal modern slavery review is carried out.

12. Reporting concerns

Any person who suspects modern slavery, trafficking, coercion or exploitation must report the concern immediately to the Director / Compliance Officer.

Concerns may also be raised under the Whistleblowing Policy. In an emergency or where a person is in immediate danger, the police or emergency services should be contacted.

Reports will be handled confidentially as far as reasonably possible. No person will suffer retaliation for raising a genuine concern in good faith.

13. Response and investigation

TeachersDesk Ltd may:

- take immediate steps to protect the person at risk;
- preserve records and relevant communications;
- pause or terminate an assignment or supplier relationship;
- interview relevant persons and obtain specialist advice;
- notify the customer, school, trust, Value Match or HEART where required;
- report the matter to the police, local authority, regulator or another appropriate authority;
- correct pay, records or working arrangements;
- support a worker to access appropriate independent help; and
- review controls and lessons learned.

14. Suppliers and contractual action

A supplier or associated person that fails to meet this policy may be required to provide corrective action, evidence of improvement or additional assurances.

Serious or repeated non-compliance may lead to suspension, termination, recovery of losses, customer notification or referral to an appropriate authority.

15. Training and awareness

Relevant staff will receive proportionate information on modern slavery risks, warning signs, recruitment fees, worker vulnerability, supplier due diligence and reporting routes.

Workers and candidates will be informed of appropriate routes to raise concerns about pay, coercion, unlawful fees or exploitation.

16. Record keeping and confidentiality

Due-diligence records, reports and investigations will be stored securely with access restricted to authorised persons.

Personal information will be handled in accordance with the Data Protection Policy, Information Security and Confidentiality Policy and Retention Policy.

17. Monitoring and review

The Director / Compliance Officer will review reports of exploitation, unexplained payroll deductions, shared bank details, supplier due diligence and relevant staff training. The review will record what was checked, actions taken, outstanding issues and whether corrective actions have been verified.

This policy will be reviewed at least annually and sooner following a significant incident, legal change, contractual change or identified weakness.

18. Modern slavery statement

Where TeachersDesk Ltd becomes legally required, or elects voluntarily, to publish a modern slavery statement, the statement will describe the Company's structure, risks, due diligence, controls, training and effectiveness measures for the relevant financial year.

This policy provides evidence of TeachersDesk Ltd's ethical labour controls. Any statutory or voluntary modern slavery statement will be prepared separately for the relevant financial year.

19. Breaches

Participation in modern slavery, concealment of exploitation, retaliation, falsification of records or failure to report a serious concern may result in disciplinary action, termination of engagement, termination of supplier arrangements and referral to an appropriate authority.

Appendix A - Modern slavery concern record

Field	Details
Date and time received	
Person raising concern	
Person(s) potentially at risk	
Supplier / customer / assignment involved	
Factual summary	
Immediate danger or safeguarding risk	
Warning signs identified	
Immediate action taken	
External bodies notified	
Evidence preserved	

Investigation outcome	
Worker support provided	
Corrective or contractual action	
Closure and review date	

Appendix B - Supplier due-diligence checklist

Check	Complete	Date	Notes
Identity and ownership verified	☐		
Business legitimacy reviewed	☐		
Labour / modern slavery policy reviewed	☐		
Payment and workforce model understood	☐		
Adverse information considered	☐		
Conflicts / intermediaries reviewed	☐		
Contractual obligations included	☐		
Higher-risk evidence obtained	☐		
Approval completed	☐		
Review date set	☐		

Appendix C - Approval

Approved by	Ilkan Pasa, Director
Signature	
Date	
Next review	Within 12 months of approval