



dBs Institute Modern Slavery Policy

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About Us

dBs Institute of Music (DBS Music UK Holdings Ltd, DBS Music Holdings Ltd, DBS Bristol Ltd, DBS Falmouth Ltd, Deep Blue Sound Ltd) ('The Institute', 'dBs Institute' 'dBs') is part of the Access Education Group Ltd (AEG). Whilst Governance is overseen by the dBs Institute Board of Directors, some key operational aspects of our business are managed by centralised services within AEG.

Responsibility for Data Protection related Policies within dBs falls to the DPO for AEG (contact details at the end of this policy).

Purpose

This Policy details The Institute's approach to complying with the Modern Slavery Act 2015, and our commitment to acting ethically throughout our business practices. In addition, it will also outline our processes and controls to ensure slavery is not taking place within our supply chain.

This Policy's use of the term 'modern slavery' has the meaning assigned to it within the Act.

Scope

This policy applies to all individuals associated with dBs Institute, including all employees, agency and freelance workers, consultants and the self-employed. It extends to all activities conducted for and on behalf of all departments, entities and subsidiaries.

The Board of Directors & Senior Leadership Team are responsible for ensuring that this policy is implemented

It is the responsibility of all other employees to be vigilant to the flags and warning signs of modern slavery, and to report these through the appropriate channels.



**Institute
of Music**

What is Modern Slavery?

Modern slavery is a crime, and a violation of fundamental human rights. The Modern Slavery Act 2015 encompasses the crimes of slavery, servitude, forced or compulsory labour, and human trafficking within their definition of modern slavery, all of which remove an individual's liberty, while in the process allowing those who exploit them to do so for commercial gain.

The Institute has a zero tolerance approach to modern slavery. We are committed to conducting our business activities ethically and with integrity. We expect all members of our supply chain to uphold similar values, and to be proactive in their approach to tackling modern slavery.

Our Approach

All employees must read, understand and adhere to this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Appropriate due diligence will be carried out on all suppliers, particularly those within geographies or industry sectors where the risk of modern slavery is higher. AEG has implemented a Supplier Code of Conduct which includes specific prohibitions on the use of any form of forced labour or child labour.

dBS Institute will act on any information received, either from internal or external sources, on the possibility of modern slavery practices within the business or in its supply chain.

Investigations will be led by the Modern Slavery Champion, an individual selected by AEG to act as the designated point of contact for these issues, and to ensure the business maintains good working knowledge of this issue. The Board will support all investigations and will promote openness across the business.

Employees will be provided with training annually on the issue of Modern Slavery, and the key indicators to look out for, particularly when dealing with learners and their families.

Reporting a Modern Slavery concern

Employees are asked to speak to their direct line manager regarding any concerns relating to modern slavery. Managers are asked to escalate this to the SLT, who will report to the AEG the Modern Slavery Champion. These reports will be used to mitigate and eliminate risk.

Where appropriate, the Modern Slavery Champion will escalate the concern externally:

- In emergency situations, where there is an imminent threat to an individual's safety, modern slavery crimes will be reported to the local police by dialling 999.

- If information is collected that could lead to the identification, discovery and recovery of victims in the UK, we will contact the Modern Slavery Helpline 0800 0121 700.



Document Control

This policy will be retained for the duration of our processing and for a minimum of 6 months after processing ceases, and will be reviewed annually.

VERSION CONTROL

PURPOSE/CHANGE	AUTHOR	DATE APPROVED
Version 1 (previously under AEG Policy) Review annually	Oliver Thompson, Executive Head of Governance & Compliance	March 2026