Appendix 23
DUNCAN'S Minibus Policy
& Code of Practice
Safe Use of Minibuses
Date: 14 May 2025

Modern Slavery and Human Trafficking Statement Duncan Hire Itd

Financial Year 2024/2025

#### 1. Organisational Overview

Duncan Hire Itd, trading in conjunction with Duncan Self Drive & Duncan Private Hire, operates as a provider of self-drive hire and specialist passenger transport services. With a head office based in Swindon and an additional operational site in Melksham, the business delivers self drive vehicles and accessible transport services to both wheelchair users and able-bodied passengers on a consistent, year-round basis. Strategic leadership and operations are overseen by 2 Directors.

### 2. Our Understanding of Modern Slavery

Duncan Private Hire recognises modern slavery as encompassing a wide range of exploitative practices, including:

- Human trafficking
- Forced or coerced labour through physical or psychological threat
- The control or ownership of individuals through abuse or threats
- Treatment of individuals as commodities or property
- Physical confinement or restrictions on freedom of movement

#### 3. Our Commitment

We are committed to upholding the principles of the Modern Slavery Act 2015 and maintaining transparent, ethical practices across all areas of our operations and supply chains. Our stance includes:

- A zero-tolerance approach to slavery and human trafficking
- Avoidance of, or withdrawal from, relationships with any organisation knowingly involved in such practices

- Ensuring that all labour involved in the delivery of our services is voluntarily provided and legally employed within the UK
- Exceeding statutory employment standards where possible, as part of our ethical obligations

## 4. Risk and Exposure

While our exposure to modern slavery is considered limited due to the nature of our services, we remain vigilant:

- Our key supply chains relate to service provision, where minimal external labour involvement occurs
- We assess and monitor these relationships to identify and mitigate any potential risks of unethical labour practices

# 5. Our Due Diligence Approach

To prevent modern slavery within our operations and supply chains, we have implemented the following measures:

- Conducting appropriate due diligence on suppliers and service partners
- Monitoring public enforcement reports and maintaining readiness to disengage from non-compliant partners
- Enabling confidential reporting via our Whistleblowing Policy, and taking all concerns seriously
- Taking action against any entity or individual associated with confirmed modern slavery involvement

#### 6. Measuring Effectiveness

We assess our effectiveness through the following actions:

- Maintaining a centralised and up-to-date supplier database
- Monitoring whistleblowing reports and responding appropriately
- Taking corrective action promptly where necessary

#### 7. Policy Framework

Our commitment is underpinned by a suite of internal policies, including:

A Modern Slavery Prevention Policy

• A Whistleblowing Policy that encourages staff to report ethical concerns without fear of

reprisal

8. Governance and Accountability

We have appointed a Compliance Manager responsible for overseeing our adherence to modern slavery legislation and ensuring internal policies remain robust and effective. The Compliance Manager conducts annual reviews and coordinates training for relevant

staff on identifying and addressing modern slavery risks.

9. Statement Review and Approval

This statement has been prepared in accordance with Section 54(1) of the Modern Slavery Act 2015 and applies to Duncan Private Hire and associated operations for the financial year 2022/2023. It will be reviewed and updated annually.

Signed:

Peter Simpson

Position: Director

Date: 19 February 2023