

# Modern Slavery & Human Trafficking Statement & Policy

## 1) Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2) The Risk

- a) We consider the risk within our employees, operations and supply chain to be low for the following reasons;
  - i) The nature of the funding for apprenticeships means those we work with have to be UK citizens or have been resident for over 3 years with the right to remain;
  - ii) We have no operations or supply chain partners in countries with a high prevalence of modern slavery;
  - iii) We have a robust process for employing staff and checking the employment status of apprentices to ensure their hours and wages meet the statutory rules.
  - iv) We check Apprentice employment contracts to ensure the correct hours and wages are in place.
  - v) Training Officers meet with the apprentices regularly in a one-2-one situation and ask them welfare questions which gives the learner opportunity to disclose information about their employment or personal life.

## 3) Supply Chain and Employers

- a) Our operations and procurement take place within the UK and we expect those we work with to hold a robust policy that complies with the Modern Slavery Act 2015.

## 4) Policy

- a) Policy Introduction
  - i) We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our terms and conditions of business, we require compliance with this policy and the Modern Slavery Act 2015 which contains specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, (whether adults or children), and we expect that our suppliers will hold their own suppliers to the same high standards.
- b) Application of this Policy
  - i) This policy applies to all persons working for us or on our behalf in any capacity, including (but not exclusively): employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-

party representatives, business partners and academic partners, wherever they may be located.

- c) Responsibility for this Policy
  - i) The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
  - ii) The CEO has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
  - iii) Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are provided with adequate and regular communications on it and the issue of modern slavery in supply chains.
  - iv) This policy will be subject to annual reviews overseen by the CEO.
- d) Compliance with this Policy
  - i) All employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners and academic partners (“You”) must ensure that you read, understand and comply with this policy.
  - ii) The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.
  - iii) You must notify the CEO or Boards of Trustees as soon as possible if you believe or suspect that a conflict with this policy is occurring, has occurred, or may occur in the future.
  - iv) You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
  - v) Where appropriate, and with the welfare and safety of the person as a priority, you should give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
  - vi) If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains or partner employers constitutes any of the various forms of modern slavery, raise it with the CEO, or, if it is not appropriate to do so, with the Board of Trustees.
  - vii) We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be taking place in any part of our own business or in any of our supply chains or partner organisations.
  - viii) Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform CEO. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.
- e) Communication and Awareness of this Policy
  - i) Staff are trained on modern slavery and human trafficking and this policy is available to them, our partner employees, our supply chain and the wider public via our website.

- ii) Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- f) Breaches of this Policy
  - i) Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct.
  - ii) We may terminate our relationship with other individuals, partners and organisations working on our behalf if they breach this policy.

## 5) Contact

The CEO can be contacted using the following details:

The Engineering Trust Training Ltd, 2 The Courtyard, Home Farm, Caversfield, Bicester, OX27 8TG.  
Telephone 01993 882008. Email [info@theengineeringtrust.org](mailto:info@theengineeringtrust.org)