

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT & POLICY

1) Statement

- a) 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 to exploit them for personal or commercial gain. Engineering Trust Training (ETT) 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) Annual Statement & Transparency

- a) ETT will publish an Annual Modern Slavery Statement on its website, outlining actions taken to prevent modern slavery in our operations and supply chains.
- b) This statement will include details of due diligence activities, staff training, and any remediation measures implemented.

3) The Risk

- a) We consider the risk within our employees, learners and supply chain to be low for the following reasons;
 - i) The nature of the funding for apprenticeships means those we work with must 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 1to1 situation and ask them welfare questions which gives the learner opportunity to disclose information about their employment or personal life.

4) Risk Assessment Criteria

- a) To maintain a thorough understanding of modern slavery risks, ETT will use the following criteria to assess both existing and potential risks within our operations, employers and subcontractors.
 - i) Geographical Risk. Identify and monitor employers and subcontractors operating in regions with a high prevalence of modern slavery.
 - ii) Risk Monitoring and Reassessment. ETT will re-evaluate risk areas at least annually or as needed in response to changes within our operations, employers and subcontractors. Each year, we will:

- (i) Conduct an annual due diligence process and establish the steps employers and subcontractors are taking to prevent modern slavery taking place.
 - (ii) Require employers and subcontractors to confirm they have a suitable policy to prevent modern slavery taking place.
 - (iii) ETT will monitor compliance through annual audits and report on key indicators, such as the percentage of suppliers verified and staff trained. Outcomes will inform continuous improvement of this policy.
 - b) Review the outcomes of regular apprentice checks to ensure no evidence or indication of exploitation is present, especially during one-on-one meetings with training officers.
 - c) ETT will maintain documented evidence of compliance checks, including completed questionnaires, copies of policies, and outcomes of any audits. Records will be retained for a minimum of six years in line with our Data Retention Policy.
 - d) Personal data collected during modern slavery investigations will be processed in accordance with UK GDPR and ETT's Privacy Policy. Access will be restricted, and confidentiality maintained throughout.
- 2) Preventive Measures and High-Risk Management**
- a) Modern slavery concerns will be escalated through ETT's safeguarding procedures to ensure the welfare of apprentices and vulnerable individuals is prioritised. SEND/LLDD needs will be considered when assessing risk and providing support.
 - b) For employers, subcontractors or areas identified as high-risk, ETT will implement enhanced oversight measures, including:
 - i) Regular Assurance Activities
 - (1) High-risk employers or subcontractors may be subject to periodic assurance activities to verify compliance with the Modern Slavery Act and our policy standards.
 - ii) Remediation Plans
 - (1) In cases where modern slavery risks are identified, ETT will work with the other party to implement a corrective action plan, specifying timelines and outcomes. Failure to meet these requirements may result in suspension or termination of the relationship.
- 3) Supply Chain**
- 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 work, consistent with our disclosure obligations under the Modern Slavery Act 2015.
 - ii) We expect the same high standards from all of our employers, subcontractors and suppliers, and as part of contractual arrangements, 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 ETT 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) All ETT staff are responsible for complying with this policy and are provided with adequate and regular communications on it and the issue of modern slavery in supply chains.
- d) Compliance with this Policy
 - i) All employees, employers, subcontractors, learners, external consultants and third-party representatives must ensure they have 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) This policy is available to employees, employers, subcontractors, learners, external consultants, third-party representatives and the wider public via our website.
 - ii) All staff involved in recruitment, learner welfare, and subcontractor/supplier management will complete mandatory training on modern slavery awareness and reporting procedures. Training will be refreshed annually and extended to subcontractors and key suppliers where appropriate.
 - iii) 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) If you breach this policy, you 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) Whistleblowing Procedure

- a) ETT is committed to providing a safe, confidential channel for reporting any concerns related to modern slavery. All employees, apprentices, and partners can report suspicions of unethical practices anonymously following our Whistleblowing Policy & Procedure. We guarantee confidentiality and a strict non-retaliation policy to protect anyone who raises genuine concerns in good faith. Reports will be promptly reviewed, and appropriate actions taken, with updates provided as applicable.

6) Contact

- a) The CEO can be contacted using the following details:
 - i) Engineering Trust Training Ltd, The Engineering Skills Academy, 11 Wedgwood Road, Bicester, Oxon, OX26 4UL. Telephone 01993 882008. Email: m.vingoe@theengineeringtrust.org