

Modern Slavery and Human Trafficking Policy

Policy Statement

Training Works 4 U maintains relationships with many different people and organisations, as well as employing people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015 we have reviewed our existing compliance and risk management processes to determine which existing measures are in place and the further measures that may be required to prevent slavery and human trafficking taking place in any part of our business or within our employer premises.

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 ("modern slavery"), all of which include deprivation of a person's liberty by another in order to exploit them for personal or commercial gain

Training Works 4 U have a zero-tolerance approach to modern slavery within its business and supply chain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

This policy applies to all persons working for **Training Works 4 U**, or on behalf in any capacity, including employees at all levels, directors, office-based staff and field-based Assessors and IQA's.

Responsibility for the Policy

Ultimate responsibility for the prevention of modern slavery rests with the Directors of **Training Works 4 U**, the Directors have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Types of Concerns

'Whistleblowing' refers to the disclosure by individuals of suspected malpractice, illegal acts or omissions at work. Examples of the types of concerns that may be raised include:

- You suspect a person acting on behalf of **Training Works 4 U** is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our employers/learner is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of **Training Works 4 U** who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of **Training Works 4 U** or one of our Employers/learners is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Please see our Whistleblowing policy for more information.

Anonymity for those raising a concern

Training Works 4 U 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 partner premises. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations but are under no requirements to do so.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Raising a concern

Internal Reporting

As a first step employees should normally raise concerns with their immediate Line Manager or Contract Manager, where applicable. However, depending on the seriousness and sensitivity of the issue and the nature of the concern, employees may feel unable to raise the matter with their Line Manager and in this instance should approach the next level of management (A Director). The guiding rule is that employees should address their complaint to the level of management who they believe is not involved in the matter.

External Reporting

This policy has been developed in order to provide employees with the guidance and reassurance they need to raise a concern internally. However, it is recognised that there may be circumstances where employees feel it necessary to raise their concerns outside the business and in these circumstances, employees have a number of external avenues open to them.

Public Concern at Work is an independent charity and leading authority on public interest whistleblowing and can provide advice on how to raise a concern.

Public Concern at Work

T: 0207 404 6609

E: whistle@pcaw.co.uk

www.pcaw.co.uk

Employees can also raise their concerns with the proper authority (guidance is available from GOV.UK - Blowing the whistle: list of prescribed people and bodies).

Investigating Procedure

Action taken by **Training Works 4 U** will depend upon the nature of the concern.

Disclosures will be assessed to:

- Determine whether a further investigation should be conducted.
- Determine the form the investigation should take.
- Appoint an investigating officer to undertake the investigation.

If it is decided that an investigation is required, an investigating officer will be appointed who will aim to abide by the following steps:

- Obtain full details and clarifications of the concern.
- Investigate the concern with third parties / witnesses where possible and obtain objective statements.
- Secure all evidence in an admissible format.
- The discloser will, as far as possible, be kept informed of progress and, if appropriate, the final outcome of the investigation.
- Reporting of the findings will depend on the nature of the disclosure.
- If appropriate, a copy of the outcomes will be reported to the Executive Board.
- Confidential records will be maintained for monitoring purposes.

Policy Review

The Directors are responsible for reviewing this policy as necessary to ensure that it meets the legal requirement and reflects best practice.

Staff members are invited to comment on this policy and suggest ways in which it might be improved by emailing feedback to fiona@trainingworks4u.co.uk

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY – V2

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Person Responsible for policy and review	Director