



Modern Slavery Policy

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1. Introduction

Skills People Group consists of the following companies.

- *Construction Skills People*
- *C&G Assessments and Training Ltd*
- *Training Futures UK Ltd.*

The company is committed to ensuring there is transparency within the business and in its approach to tackling modern slavery throughout our supply chain. The company expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the company or on behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

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. The company have a zero-tolerance approach to modern slavery and are committed to acting ethically and integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

2. The Law

Under UK legislation, all modern slavery offences are punishable by a maximum sentence of life imprisonment.

Where victims of modern slavery have been forced into committing a crime by the perpetrators, UK legislation provides that those victims may have a defence against prosecution.

England and Wales - The Modern Slavery Act 2015 consolidated existing slavery and trafficking offences into two offences:

- **Human Trafficking**, defined as "arranging or facilitating the travel of another person with a view to exploitation". Travel includes within a country, not just across international borders.
- **Slavery, servitude and forced or compulsory labour** – the Act states that this offence has the 'same meaning' as for the purposes of Article 4 of the European Convention on Human Rights.

UK Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

3. Types of Modern Slavery

The prevalence of different types of modern slavery in the UK will vary by region and change over time, however currently there **are four broad ways** in which perpetrators may seek to exploit victims, which the Home Office research has further broken down into **17 distinct types**.

4.1.1 Labour exploitation

Labour exploitation usually involves unacceptably low pay, poor working conditions or excessive wage deductions, but is not solely about this. In order to constitute modern slavery there will also be some form of coercion meaning that victims cannot freely leave for other employment or exercise choice over their own situation. Where the perpetrator is taking advantage of a child or vulnerable person, an offence can be committed without the element of coercion.

Types of labour exploitation

1. *Victims exploited for multiple purposes in isolated environments*
2. *Victims work for offenders*
3. *Victims work for someone other than offenders*

4.1.2 Domestic servitude

Domestic servitude typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay. The victim could be used in this way by their own family members or partner. Again, it is very difficult for them to leave, for example because of threats, the perpetrator holding their passport, or using a position of power over the victim.

Types of domestic exploitation

4. *Exploited by partner*
5. *Exploited by relatives*
6. *Exploiters not related to victims*

4.3.1 Sexual exploitation

Victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation. Victims may be brought to the UK on the promise of legitimate employment or moved around the UK to be sexually exploited. In some cases, they may know they will be involved in sex work but are forced into a type or frequency they did not agree to. Victims are more commonly female but can also be male.

Types of sexual exploitation

7. *Child sexual exploitation – group exploitation*
8. *Child sexual exploitation – single exploiter*
9. *Forced sex work in fixed location*
10. *Forced sex work in changing location*
11. *Trafficking for personal gratification*

4.4.1 Criminal exploitation

Criminal exploitation is the exploitation of a person to commit a crime for someone else's gain. For example, victims could be coerced into shoplifting, pick-pocketing, entering into a sham marriage, benefit fraud, begging or drug cultivation such as cannabis farming.

Forced removal and trafficking of **human organs** is an additional category of modern slavery that occurs globally, however there have been no confirmed cases in the UK.

Types of criminal exploitation

12. *Forced gang-related criminality*
13. *Forced labour in illegal activities*
14. *Forced acquisitive crime*
15. *Forced begging*
16. *Trafficking for forced sham marriage*
17. *Financial fraud (including benefit fraud)*

5. 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 the company or under their control. As such are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you are unsure about whether the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with a member of the safeguarding team.

Immediately notify a member of the safeguarding team if you:

- *have any concerns about any issue of suspicion of modern slavery*
- *believe or suspect that a conflict with this policy has occurred or may occur in the future*

Safeguarding contact numbers:

- Julie Lawton: 01246 589459 / 07976 745460
- Perry Adams: 01246 589501 / 07860 917688
- Sarah Booth 01246 589509 / 07872 989368

The company aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn to be mistaken. The company are committed to ensuring no one suffers any detrimental treatment because 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 part of our supply chain. If you believe that you have suffered any such treatment, you should inform a member of the safeguarding team immediately.

6. Communication and Awareness

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given when needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Responsibility for the Policy

Management at all levels have the responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels have day-to-day responsibility for implanting 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

7. Right to Access Information

Individuals have the right to access personal data that is being held about them either on computer or in manual files. An individual who wishes to exercise this right is required to submit a subject access request to The Data Protection Officer.

8. Policy Breaches

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

9. Monitoring

Monitoring of this policy will be the responsibility of the Quality Manager and Human Resources annually or, in line with changes to legislation.

Document Control

Date of change	Version	Overview of amendment	Amended by (Job title)	Approved by	Approval date
19-03-18	1	Policy created	Sharon Lawrence (Quality Manager)	Director	19-03-18
21-12-18	2	Policy revision: to include, The Law, Modern Slavery types, reporting concerns to the safeguarding team, monitoring and rights to access information.	Julie Lawton (Quality Manager)	T Armstrong	21-12-18