



Anti-Modern Slavery and Anti-Trafficking Policy

Date established:	March 2016
Updated:	Version 2.2
Reviewed:	Annually Sept 2022
Purpose:	This policy aims to set out the position of MITSkills regarding the requirements of the Modern Slavery Act 2015 and Anti- Modern Slavery and or Human Trafficking.

Aims

In October 2018 the Home Office wrote to the Chief Executives of 17,000 companies advising them that they needed to register with the [Modern Slavery Contact Database](#).

MITSkills as business did not receive this communication, however, we checked if our business was required to comply with the Act. At the last annual review, the requirements were if a business matches the following:

- It is commercial in nature
- It has a global turnover of over £36 million
- It carries on a business, or part of a business, in any part of the United Kingdom
- It supplies goods or services

It did not matter which sector a business operates in or whether a company was based in or outside of the United Kingdom. If a business operates within the United Kingdom and fits the above criteria, the business will need to comply with the Act.

If a business is an overseas business and its UK-based subsidiary's activities would fit with the criteria under the Act, it might be that the overseas organisation is subject to the Act as well, but individual analysis on a case-by-case basis will be required. MITSkills can confirm that we do not meet the threshold to meet the requirements of the Modern Slavery Act 2015 at the time of reviewing this policy.



What are the Modern Slavery Act requirements?

If a business fits the criteria above, they must publish a 'slavery and human trafficking statement' (Statement) for each financial year. As stated above, this Statement must disclose steps the business has taken to ensure that slavery and human trafficking is not taking place in their own business and in the businesses of those in their supply chains. Where no steps have been taken to prevent modern slavery, a Statement must also disclose this point.

The Statement must be approved by the Board of the company, signed by a director (or someone at least as senior) and the Statement should be prominently linked on the company's homepage on their website.

Currently there is no requirement to also upload the Statement to a centralised government website, but the Business and Human Rights Resource Centre is pulling together a central register of Statements to be able to easier compare businesses and their actions against modern slavery.

The [Practical Guide](#), released by the Home Office, highlights six areas that companies could consider covering in their Statements.

These include:

- Business organisation, structure, and supply chains
- Policies
- Due diligence
- Risk assessment
- Performance indicators
- Training

Whilst the six areas are guidance and not requirements, MITSkills understands it advisable for Statements to cover all these areas, such as the details of policies and procedures, a description of the training provided to staff, and commercial agreements your organisation has in place regarding



obligations on suppliers to comply with minimum standards and ethical practices. MITSkills reviews their position annually to ensure we avoid the reputational risk associated with the perception that a need for a Statement is 'incomplete.'

As part of good practice, we issue the following Policy noting that there is no current requirement of the Act requiring us to do so.

MODERN SLAVERY POLICY 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.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We have a zero-tolerance approach to modern slavery or human trafficking, and we are committed to acting ethically and with 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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery or human trafficking throughout our supply chain. We 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 us or on our 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. This



policy does not form part of any employee's contract of employment, and we may amend it at any time.

RESPONSIBILITY FOR THE POLICY

The Operations Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all staff under MITSkills control comply with it. The Operations Director 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. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this 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 us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Operations Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery or human trafficking in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible. 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or the Operations Director. 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 or human trafficking 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 your manager immediately.

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery or human trafficking in its supply chain will be given where needed. The policy is provided on the company SharePoint and on our website. Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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Approved By:	 Company Director: Date 010922



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