

Anti-Modern Slavery and Anti-Trafficking Policy

Date established:	March 2016
Updated:	Version 2.5
Reviewed:	Annually March 2025
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.

Criteria for registering with the [Modern Slavery Contact Database](#). As defined in the Modern Slavery Act 2015:

- 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 or are based outside of the United Kingdom. If a business operates within the United Kingdom and fits criteria above, the business will need to comply with the Act.

MITSkills can confirm that we do not meet the threshold to meet the requirements of the Modern Slavery Act 2015 as of 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 part of good practice, MITSkills issue the following policy noting that there is no current requirement of the Act requiring us to do so.

MITSkills Business Structure

MITSkills is a UK Private Limited Company, an SME with less than 250 employees, operating as an Independent Training Provider, delivering Apprenticeships, Study Programmes, HTQs, Skills Bootcamps, and Employer Led Training.

It has no parent company and does not hold shares in any other companies.

MITSkills occasionally use subcontractors to deliver training to meet employer or customer led demand, all subcontractors are required to adhere to our Modern Slavery and Anti Trafficking policy and comply with the requirement of the Modern Slavery Act as part of our due diligence.

Supply chain: Currently we will review suppliers over £100K expenditure at contract set up as part of due diligence assessment, which includes requirements of the Modern Slavery Act, this will be reviewed at least annually by the finance department and is the responsibility of the Finance Director.

Currently we believe that the most likely part of the business to be exposed to Modern Slavery and Anti Trafficking are vulnerable learners. All staff and tutors receive annual mandatory training in Safeguarding, Prevent and KCSiE as part of awareness of identifying and supporting vulnerable learners including those who may be victims of modern slavery and/or people trafficking (including county lines activity).

Safeguarding issues including modern slavery and/or people trafficking are dealt with by our Designated Safeguarding Lead and reviewed by our Directors and Governance board at least every 6 months.

Supply chain issues are reported to the Managing Director by the Finance team and reported to the authorities where appropriate.

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

The policy is available to all staff via our SharePoint and on our website. As part of the induction process all staff are expected to familiarise themselves with the company policies. 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. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify their manager or the Operations Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Staff 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 staff believe or suspect a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If they 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 their 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 a member of staff believes that they have suffered any such treatment, they should inform their manager immediately.

When specific instances of modern slavery and human rights abuses have been uncovered in MITSkills or our supply chain, they must be addressed immediately and in a manner that is proportionate and adapted to the circumstances of the case. In some cases, abuses will be a consequence of the way a specific industry is organised, and these may require a longer-term approach to address the root cause.

Generally, we will seek to work collaboratively with the supplier and in accordance with the terms of the contract to address instances of modern slavery.

If a member of staff suspect workers are being subjected to modern slavery, they should involve law enforcement agencies:

In the UK, if someone is in immediate danger, report it to the police by dialing 999.

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.

The policy 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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