

# Anti-Slavery Policy

## Policy Statement

We are committed to improving our practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery across all areas of our Company. We are committed to ensuring that we are not connected to modern slavery in any way.

This statement is made within our Policy in acknowledgement of obligations in accordance with the Modern Slavery Act 2015 and the Policy sets out the steps that Intech Centre has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Intech Centre has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity, openness and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

## Types of modern slavery

- Sexual exploitation
- Domestic servitude
- Criminal exploitation
- Labour exploitation

**Victims of modern slavery can be men, women, or children. They can be any nationality; the most common nationalities are from:**

- |           |           |               |
|-----------|-----------|---------------|
| ▪ Albania | ▪ China   | ▪ India       |
| ▪ Vietnam | ▪ Romania | ▪ Afghanistan |
| ▪ UK      | ▪ Poland  |               |
| ▪ Nigeria | ▪ Eritrea |               |

## Indicators of a potential victim may include:

- Distrustful of authorities
- Expression of fear or anxiety
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Perception of being bonded by debt
- Passport or documents held by someone else
- Restriction of movement and confinement to the workplace or to a limited area
- Person forced, intimidated, or coerced into providing services
- Substance misuse
- Money is deducted from salary for food or accommodation
- Being placed in a dependency situation
- Inappropriate sexual behaviour
- Limited/sporadic school attendance (under 18s)
- No or limited access to bathroom or hygiene facilities

**Please click this link to access for information about modern slavery:**

<https://www.gov.uk/government/collections/modern-slavery>

## Our Business

Intech Centre provides government funded training, careers advice work preparation and job applications to help people achieve qualification, reach their targets and progress back into employment.

## Risk Reduction

We are committed to supporting people back into work and building strong relationships within our local communities and local and national employers.

We aim to work in partnership with all our employers, suppliers, stakeholders and other business partners to ensure that they share and work towards our opposition to slavery and human trafficking and we expect our suppliers to hold their own suppliers to the same high standards.

As part of our commitment to tackling modern slavery and human trafficking, we have in place systems to:

### Suppliers

- Identify, mitigate and monitor potential risk areas in our company and suppliers
- Check and confirm that current and future suppliers are conversant with the terms of the Modern Slavery Act 2015 and that they have suitable steps in place to ensure their suppliers are also conversant with their obligations
- Work only with suppliers who pay the national minimum wage or national living wage as appropriate
- Consider terminating a contract should any associated issue come to light

### Partner Employers

- Mitigate the risk through building established relationships with current employers and work with new employers to mitigate and monitor any potential risks.
- Eliminate the risk factors associated with our employer networks that recruit our clients.
- Monitor our employer networks to ensure compliance with the Modern Slavery Act 2015.
- Deal only with employers who pay their staff the national minimum wage as a minimum.
- Encourage the reporting of any wrongdoing through internal and external whistleblowing procedures.
- Protect whistle-blowers.
- Ensure all our staff are conversant with the terms of this policy and their personal responsibilities through our duty of care and guidance provided within this and our Safeguarding Policy.
- Check with clients through our in work support if there are any associated issues arising.
- Consider terminating our relationship with any employer should any associated issue come to light

We monitor our processes and report on any associated issues to the Senior Manager that come to light.

We have assessed our risk of exposure to slavery and human trafficking as low

## Our Policies

Our Anti-Slavery Policy is available to all our staff via the company network.

The prevention, detection and reporting of modern slavery in any part of our organisation is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our organisation, supply chains or employers recruiting our clients at the earliest possible stage.

## Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in employer networks. We are committed to improving our practices to combat slavery and human trafficking.

## Statement & Policy Review

This statement and policy will be overseen and reviewed annually by the Senior Manager. We will know the effectiveness of the steps we are taking to ensure that slavery and/or human trafficking is not taking place within our business if no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.