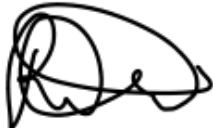




Multi Trades Training

Modern Slavery Statement & Policy

Review Date: July 2024

Approved by	RK Jones	Position	Director
		Date	15 th June 2023

Document Control

Date	Review & Revision	By
15/06/23	Link to legislation added	Quality Lead

Policy Statement for Multi Trades Training Ltd (MTT)

Introduction

This statement sets the actions and steps we maintain to prevent slavery and human trafficking. In this statement we aim to give a transparent report on our progress in addressing any risks.

Multi Trades Training (MTT) have a zero-tolerance approach to modern slavery and human trafficking, and we are fully committed to preventing slavery and human trafficking in our activities and supply chains.

MTT is a work-based learning provider offering a range of apprenticeships and qualifications. We work across England and deliver contracts with funding from the Education & Skills Funding Agency (ESFA).

The following pieces of legislation are relevant to this procedure:

- Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015;
- Modern Slavery Act 2015; Criminal Justice (Scotland) Act 2003;
- Asylum and Immigration (Treatment of Claimants, etc.) Act 2004;
- Criminal Justice and Licensing (Scotland) Act 2010.

Modern Slavery encompasses many different types of behaviours and abuse, perpetrated against individuals from any background and of any age. Modern Slavery is abuse and therefore is included in the MTT Safeguarding Policy and Procedures.

The different types of abuse that come under the umbrella term of Modern Slavery are:

- Slavery, servitude and forced or compulsory labour (s.1 MS Act)
- Human Trafficking (s.2 MS Act) (the purposeful movement of a person for exploitation in whatever form. There is no minimum or maximum distance (i.e. it can be from one room to another)

Exploitation can include (in addition to the above):

- Sexual exploitation (i.e. forced into prostitution, regardless of age of the individual being exploited)
- Removal of organs
- Securing services by force, threats or deception (in particular if the individual being exploited is a child or an adult at risk). This can also include an individual being forced into committing criminal acts against their will as a possible debt-bondage process

Commitment

MTT is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA (Modern Slavery Act) in any part of our organisation or in our supply chain. For more information, please visit

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

MTT welcomes transparency as encouraged by the MSA and this statement sets out for the public, our stakeholders, suppliers and employees the steps we are taking in this regard.

Recruitment

At the point of recruitment, appropriate checks in accordance with relevant laws are carried out on prospective employees and we work closely with the relevant teams in the local territories to make sure that pay and conditions are appropriately managed. See the MTT Safe Recruitment Policy.

In accordance with our commitment to acting ethically and with integrity in all our business relationships, we intend to implement effective systems and controls to ensure Modern Slavery is not taking place in our supply chains. This will involve ensuring the effective communication and reinforcement of relevant policies, which give a clear view of the values and principles that underpin all our work and that we expect all persons involved in our business and supply chain to adhere to.

These policies comprise of the MTT Code of Conduct and the MTT Equality & Diversity Policies, alongside Safeguarding. The MTT whistleblowing policy ensures that there is a process for direct reporting for all concerns.

Indicators of Modern Slavery

Child Sexual Exploitation is a named type of abuse in its own right. This is the specific targeting of children (anyone under the age of eighteen) in order to exploit them sexually. Typically, this occurs with gangs of perpetrators, who may use drugs, alcohol and/or gifts to groom the child. It is important to note that with all cases of child sexual exploitation, a child is unable to consent to their own abuse.

Indicators of modern slavery include:

- Individuals not being paid for the work they undertake
- Individuals being held in debt-bondage (being told they “still” owe money after having paid off a previous debt)
- An individual’s passport being held by their “employer” in order to keep the individual at work
- Multiple benefit claimants having their benefits being paid into the same account
- An individual not having freedom of movement (i.e. Passport being taken)
- Clear exploitation of an individual by another for financial or sexual gain.

Under the Modern Slavery Act 2015, we are required to ensure we do not have any aspect of modern slavery within our own organisation and within our supply chain. As such, we have to issue a statement, published on our website, which clearly reflects this and the actions we have taken and will continue to take, in order to address this.

Responding to concerns about modern slavery

If any staff member, contractor, associate, learner or employer within MTT has any suspicions or concerns that any aspect of modern slavery may be occurring, they must take appropriate actions.

Relevant procedures for doing this are detailed below:

Internal staff working with service users

- Concern is identified: this could be a service user is a victim or perpetrator, or a service user informs us of a concern they have
- Staff member discusses this with their line manager (where appropriate) and the Safeguarding Manager immediately.

please note, if an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999

Next steps

According to the nature of the concern, the Safeguarding Manager will lead on the next actions that are to be taken. This will be on a case-to-case basis.

Next steps could include:

- Notifying the police
- Contacting the Modern Slavery helpline (0800 0121 700)
- With the individual's consent, completing a referral to the National Referral Mechanism (NRM) (national framework for identifying potential victim of human trafficking and modern slavery and providing appropriate care) (England and Wales/Scotland/Northern Ireland)
- Referral to an external agency

Safeguarding Policy

Our safeguarding policy sets out the legislative requirements to provide a duty of care and provide a clear process for escalating concerns to protect individuals. We have a dedicated safeguarding officer whose number is available to all and email address to enable people to easily raise any concerns.

Prevent Policy

Our Prevent policy sets out a clear framework to structure and inform our response to safeguarding concerns for those people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process

Code of Conduct

Our code of conduct makes it clear to employees the actions and behaviour we expect from them when representing the company. We strive to maintain high standards of behaviour and strong ethical standards across the business including our employers.

Whistleblowing Policy

We encourage all employers, service users and partners to report any concerns related to the direct activity of the business or supply chain partners. The procedure is designed to make it easy for disclosures to be raised, without fear of reprisal.

Equality & Diversity Policy

Our equality and diversity policy ensure that we respect and value the diversity of our learners, customers, employees, supply chain partners, partners, employers and all other people we work with. We strive to create a positive working environment to support learning and improve employment opportunities where everyone is treated with dignity and respect

Due Diligence & Risk Management

We expect the highest standards of conduct throughout our supply chain partners and for everyone to act with honesty and integrity. Part of our due diligence process includes the reviewing of policies to ensure that all supply chain partners we work with have suitable processes in place to reduce risks. MTT will continue to work with supply chain partners to ensure that they meet the standards and comply with the requirements of the Modern Slavery Act 2015.

Training

Policies and processes are annually reviewed and cascaded to the business via our internal quality update and standardisation meetings, which ensures all employees are kept up to date. All employees, contractors and associates undergo a series of training annually, to ensure they have good understanding and knowledge on a variety of subjects.

Approval

This statement is made pursuant to section 54(1) of the Modern slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2021/2022. This statement has been validated and signed by our Managing Director and is published on our website.

Review

This policy and its procedures will be reviewed annually, to ensure it continues to meet our needs and those of our Regulators i.e., Awarding Organisations (NOCN Cskills Awards) and external stakeholders, i.e. learners and employees.

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