

## **Modern Slavery and Antitrafficking Policy**

### **1. Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 August 2020.

The Skills and Education Group takes a zero-tolerance approach to modern slavery and human trafficking. This statement sets out the preventative steps that the Group is taking or intends to take to avoid the risk of modern slavery occurring within our services.

### **2. Organisational Structure and Purpose**

The Skills and Education Group unites education and skills orientated organisations that share similar values and objectives. With more than one hundred years of collective experience, the Group's strategic partnerships create opportunities to inform, influence and represent the wider education and skills sector.

The Skills and Education Group is a limited company by guarantee (Company 02640936) and a registered Charity (Charity Commission Registration 1004087). It is the parent company to:

- Skills and Education Group Awards - a national awarding organisation that develops and awards a diverse range of vocational qualifications for all aged post-14. Skills and Education Group Awards is a limited company by guarantee (Company Number 04117784) and a registered charity (Charity Commission Registration 1086947)
- Skills and Education Group Access – an Access Validating Agency that develops, approves, monitors and awards Access to HE diplomas. Skills and Education Group Access is a limited company by guarantee (Company Number 03773914) and a registered charity (Charity Commission Registration 1088839)
- BIIAB Qualifications Limited (trading as BIIAB) - a national awarding organisation primarily operating in the licensed hospitality sectors, offering qualifications and assessments in for all abilities and ages post-14. BIIAB is a private limited company (Company Number 10054831)
- Quality Licence Scheme Limited – the Quality Licence Scheme works with training providers to support the development of high quality courses and training programmes in the non-regulated market. Quality

Licence Scheme Limited is a limited company (Company Number 10051052)

Any reference to "Group" in this document means the Skills and Education Group and its subsidiary companies.

### **3 Due Diligence**

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, the Group will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

### **4 Supply Chains**

The Group is taking a number of steps to identify and mitigate the risks associated with modern slavery and human trafficking within its supply chains. These include:

- conducting a risk assessment of our current suppliers to identify potential high risk supply chains
- developing contractual clauses that require compliance with anti-slavery measures for new supplier, agents and partners where appropriate
- continuing to raise awareness of the Modern Slavery Act 2015 and an understanding of the risks of modern slavery and human trafficking to relevant members of staff.

The following have been identified as being at higher risk to modern slavery and human trafficking within the supply chain:

- sub-contracting
- catering/food supply
- cleaning/domestic services
- ICT and office equipment and services
- building maintenance and services

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the Group's own policies and procedures, will be removed from the list of suppliers and will not be considered for future supply unless they can demonstrate that these compliance requirements are met.

The Group will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

## **5 Training to raise awareness of Modern Slavery and Human Trafficking**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant staff. We also require our business partners to provide training to their staff and suppliers and providers.

## **6 Recruitment Practices**

- a. The Group mitigates the risk of modern slavery and human trafficking by following fair recruitment and selection policies and procedures.
- b. Where staff are recruited through recruitment agencies, to mitigate the risk of any potential occurrences of modern slavery checks are conducted on such agencies before they are approved.

## **7 Relevant Policies**

The Group implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery:

- Grievance, Harassment and Bullying and Whistleblowing policies — encourages employees to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
- Anti-Bribery Policy - the Group is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy applies to all employees, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company within the UK and overseas. Any form of bribery or corruption by its employees or any person or body acting on its behalf will not be tolerated
- Recruitment and Selection Policy — this policy ensures that the Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.
- Investment Policy - social and ethical responsibilities are considered when investing and will, therefore, specifically exclude investments that disaffect minority groups and/or exploit labour

## **8 Performance Indicators**

- a. Where the Group has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Group will consider setting and reviewing KPIs in the following contexts:
  - use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
  - training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action

- oversight of third party suppliers of relevant goods and services supply chains
- b. This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.
- c. Having assessed the training needs for staff operating in different parts of the Group, they will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

This statement has been approved by the Executive Management Team and will be reviewed annually.

Signed



Paul Eeles  
Chief Executive