



# Modern Slavery and Human Trafficking Policy

| Document Ownership    |                 |
|-----------------------|-----------------|
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## Version Control

| Version | Date       | Author    | Changes                                                                              |
|---------|------------|-----------|--------------------------------------------------------------------------------------|
| 1.0     | 06/08/2024 | P Crocker | Initial policy creation                                                              |
| 1.1     | 30/08/2025 | P Crocker | Reviewed for completeness                                                            |
| 2.0     | 21/01/2026 | S Gilmore | Major revision: definitions, indicators, apprentice monitoring, reporting procedures |

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## 1. Introduction and Commitment

Hybrid Training Centre (HTC) is committed to preventing slavery and human trafficking in all its activities and ensuring that its supply chains are free from slavery and human trafficking.

HTC recognises its responsibility to take a robust approach to modern slavery and human trafficking. This policy sets out the steps HTC takes to understand potential modern slavery risks and to ensure there is no slavery or human trafficking in our business or supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes HTC's slavery and human trafficking statement.

## 2. Scope

This policy applies to:

- All HTC employees, workers, and contractors
- All suppliers and business partners
- All apprentices and learners
- Employers participating in apprenticeship programmes
- Recruitment agencies used by HTC

## 3. Definitions

| Term                     | Definition                                                                                                                                                                                       |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Modern Slavery</b>    | An umbrella term encompassing slavery, servitude, forced or compulsory labour, and human trafficking.                                                                                            |
| <b>Human Trafficking</b> | The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, or abuse of power for the purpose of exploitation. |
| <b>Forced Labour</b>     | Work or service extracted from any person under threat of penalty and for which the person has not offered themselves voluntarily.                                                               |
| <b>Debt Bondage</b>      | Where a person is forced to work to pay off a debt that is impossible to repay through reasonable means.                                                                                         |
| <b>Child Labour</b>      | Work that deprives children of their childhood, potential, and dignity, and is harmful to physical and mental development.                                                                       |

## 4. Legal Framework

This policy supports compliance with:

**Modern Slavery Act 2015** - creates offences of slavery, servitude, forced labour, and human trafficking; requires transparency in supply chains

**Human Rights Act 1998** - prohibition of slavery and forced labour

**Gangmasters (Licensing) Act 2004** - licensing of labour providers in specified sectors

**Employment Rights Act 1996** - protection of workers' rights

**National Minimum Wage Act 1998** - minimum wage requirements

## 5. Forms of Modern Slavery

Modern slavery can take many forms:

**Labour Exploitation:** Forcing people to work for little or no pay, often in poor conditions

**Sexual Exploitation:** Forcing people into prostitution or other forms of sexual exploitation

**Criminal Exploitation:** Forcing people to commit crimes such as theft, cannabis cultivation, or county lines drug dealing

**Domestic Servitude:** Forcing people to work in private homes, often without pay

**Organ Harvesting:** Trafficking people to remove and sell their organs

## 6. Organisational Structure and Supply Chains

HTC is a training provider delivering gas, electrical, and renewables training. Our supply chains include:

- Staffing resources (permanent, temporary, and agency workers)
- Facilities management and cleaning services
- IT equipment and services
- Training equipment and materials
- Transport and logistics
- Catering services

HTC works with employers who employ apprentices. We recognise that apprentices may be vulnerable to exploitation and take steps to monitor their welfare.

## 7. Responsibilities

### 7.1 Group CEO

- Overall accountability for this policy
- Ensuring adequate resources for implementation
- Approving the annual modern slavery statement

### 7.2 Head of Finance & HR

- Ensuring recruitment practices prevent exploitation
- Vetting recruitment agencies
- Maintaining supplier due diligence records

### **7.3 Designated Safeguarding Lead**

- Receiving reports of suspected modern slavery
- Liaising with relevant authorities
- Supporting victims

### **7.4 Skills Coaches and Assessors**

- Monitoring apprentice welfare during visits
- Identifying indicators of exploitation
- Reporting concerns to the DSL

### **7.5 All Staff**

- Being vigilant to signs of modern slavery
- Reporting concerns promptly
- Completing required training

## **8. Risk Assessment**

HTC assesses the risk of modern slavery in its operations by considering:

- Geographic risk (locations where slavery is more prevalent)
- Industry sector risk (sectors with higher incidence of exploitation)
- Transaction risk (unusual payment arrangements or structures)
- Business partnership risk (partners with poor compliance history)

Risk assessments are reviewed annually and when significant changes occur.

## **9. Due Diligence - Suppliers**

HTC undertakes the following due diligence on suppliers:

- Review of supplier policies on modern slavery
- Verification of compliance with Modern Slavery Act requirements
- Inclusion of modern slavery clauses in contracts
- Regular review of existing suppliers
- Removal of non-compliant suppliers

Any supplier that does not comply with the Modern Slavery Act 2015 or HTC's policies will be removed from the approved supplier list and will not be considered for future work unless compliance is demonstrated.

## 10. Due Diligence - Recruitment

HTC uses reputable employment agencies and verifies their practices before engagement. HTC requires agencies to:

- Confirm they have policies to prevent modern slavery
- Conduct appropriate right-to-work checks
- Verify worker identities
- Ensure workers are paid at least the national minimum wage
- Not charge workers fees for finding work

## 11. Apprentice and Learner Monitoring

HTC recognises that apprentices, particularly young apprentices, may be vulnerable to exploitation. Skills coaches monitor apprentice welfare through:

- Regular progress reviews asking about working conditions
- Private conversations about wellbeing
- Questions about pay, hours, and treatment
- Observation for signs of exploitation during workplace visits
- Checking employer compliance with employment law

Any concerns about apprentice welfare are reported immediately to the Designated Safeguarding Lead.

## 12. Indicators of Modern Slavery

Staff should be alert to the following potential indicators (see Appendix A for full checklist):

- Physical appearance: signs of abuse, malnourishment, poor hygiene, inappropriate clothing
- Behaviour: fearful, anxious, withdrawn, unable to speak for themselves
- Working conditions: excessive hours, below minimum wage, no contract, no breaks
- Living conditions: living at workplace, overcrowded accommodation, controlled movement
- Control: accompanied by others who speak for them, documents held by others

## 13. Reporting Concerns

Anyone who suspects modern slavery should:

- Report immediately to the Designated Safeguarding Lead
- Not alert the suspected perpetrators
- Record observations factually

External reporting:

- Modern Slavery Helpline: 08000 121 700
- Police: 101 (non-emergency) or 999 (emergency)
- National Crime Agency: [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk)

HTC's Whistleblowing Policy protects anyone who reports concerns in good faith.

## 14. Training and Awareness

HTC provides training on modern slavery to:

- All staff during induction
- Skills coaches and assessors (enhanced training)
- Staff with procurement responsibilities
- Key budget holders

Training covers: recognising indicators, reporting procedures, and legal requirements. Modern slavery awareness is also incorporated into learner inductions and safeguarding guidance.

## 15. Policy Review

This policy is reviewed annually to ensure effectiveness and compliance with legislation. The annual Modern Slavery Statement is published on the HTC website.

## 16. Related Policies

- Safeguarding Policy
- Whistleblowing Policy
- Recruitment and Selection Policy
- Anti-Bribery and Corruption Policy
- Procurement Policy
- Equality and Diversity Policy

## Appendix A: Modern Slavery Indicators Checklist

| Category                   | Indicators                                                                                                                           |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| <b>Physical Appearance</b> | Signs of physical abuse, malnourishment, unkempt appearance, inappropriate clothing for weather/work, untreated injuries             |
| <b>Behaviour</b>           | Fearful, anxious, withdrawn, avoids eye contact, appears coached in responses, inconsistent stories, reluctant to seek help          |
| <b>Working Conditions</b>  | Excessive hours, no breaks, paid below minimum wage, no written contract, poor safety conditions, no PPE, works in isolation         |
| <b>Living Conditions</b>   | Lives at workplace or employer-controlled accommodation, overcrowded conditions, restricted movement, cannot come and go freely      |
| <b>Control</b>             | Always accompanied, others speak for them, doesn't have own ID/passport, threats made, debt bondage, no access to own earnings       |
| <b>Financial</b>           | No access to bank account, wages paid to someone else, excessive deductions for accommodation/food/transport, owes money to employer |

If you observe any of these indicators, report your concerns immediately to the Designated Safeguarding Lead. You do not need to be certain - it is better to report concerns that turn out to be unfounded than to miss signs of exploitation.

### Policy Approval

**Signature:**

**Date:**

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**Sophie Gilmore**  
 Group CEO

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