



# Modern Slavery Policy

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Approved and signed off by:

Name:	Michael Winship
Position:	Managing Director
Date:	August 2025 (next review August 2026, unless required sooner)
Signature:	

## **Introduction**

Skills North East Ltd. (SNE) acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. SNE understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

SNE does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to SNE in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. SNE strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

The organisation recognises that modern slavery and human trafficking can occur in a range of forms and may not always be immediately visible. In addition to risks relating to employment practices and supply chains, SNE acknowledges that human trafficking may present through indicators affecting learners, contractors, or third parties, including but not limited to restriction of movement, control of identity documents, unusual accompaniment, unexplained absences, fear of authority, or signs of coercion or exploitation.

### **Applies to:**

This statement applies to all operations and employees within SNE.

## **STATEMENT**

This statement sets out SNE's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the academic year 1 August 2025 to 31 July 2026.

As part of the education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

As an education and training provider, SNE recognises that some learners may be at increased risk of exploitation or human trafficking due to personal, social, or economic vulnerability. The organisation is committed to identifying and responding appropriately to any concerns relating to learner welfare, and any suspected indicators of modern slavery or human trafficking will be treated as a safeguarding concern and managed in line with the organisation's safeguarding procedures.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that any supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

SNE is a national training and education specialist working with further education providers, employers, and learners to help them achieve success.

SNE works with businesses throughout the UK, supporting impactful training and skills strategies that help them meet core organisational objectives such as performance and output.

This commitment extends to employers, subcontractors, delivery partners, and any organisations involved in providing work placements, apprenticeships, or funded training opportunities. SNE undertakes appropriate due diligence to ensure that such partners operate in a manner consistent with ethical labour practices and are not engaged in, or at risk of, modern slavery or human trafficking.

### **Countries of operation and supply**

SNE currently operates in the following countries:

United Kingdom - Directly funded by the Department for Education.

### **High-risk activities**

Given the robust UK legislative framework, the risk of modern slavery and human trafficking affecting our employees and supplier employees working within the UK is considered low, but not absent. Nevertheless, we recognise our responsibility to identify and address potential infringements linked to the goods and/or services we procure. Therefore, we have put in place procedures to work to ensure that our suppliers adhere to the same standards as we apply to ourselves.

The organisation recognises that risk may increase where services involve subcontracted delivery, external training venues, employer-led activity, or learners in vulnerable circumstances. These risks are monitored through due diligence, safeguarding oversight, and ongoing engagement with partners and staff.

### **Responsibility**

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

Relevant employees, including those involved in recruitment, learner support, delivery, procurement, and partnership working, receive appropriate training to raise awareness of modern slavery and human trafficking risks. This includes recognising indicators, understanding reporting routes, and reinforcing the organisation's commitment to ethical practice. Training is refreshed periodically as part of continuing professional development.

### **Relevant policies**

The organisation operates the following policies/procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing Policy** - The organisation encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete the SNE Whistleblowing report form.

Concerns relating to modern slavery or human trafficking may also be raised through line management or directly with the organisation's designated safeguarding lead, where appropriate. Individuals raising concerns do not need to be certain that wrongdoing has occurred, and all reports will be taken seriously and handled sensitively, confidentially, and without fear of retaliation.

**Employee Code of Conduct** - This sets out expectations and principles for what SNE considers to be appropriate workplace behaviour.

**SNE Values** - Our values make clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating across the UK and managing its supply chain.

**Procurement Policy** – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with our suppliers to ensure that they meet the highest standards of ethics and improve their worker's working conditions. However, serious violations of these standards will lead to the termination of the business relationship.

**Recruitment Policy** - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

All candidates are to bring with them documentary evidence of their right to work in the UK and their identity. Evidence should be as prescribed by UK Visas and Immigration and the Disclosure and Barring Service and can include a current driving licence or passport including a photograph, or a full birth certificate, and a document such as a utility bill or financial statement that shows the candidate's current name and address (please note that these latter two are time-limited and must be no more than 3 months old). Where appropriate, evidence should also include change of name documentation. Some form of photographic ID must be seen.

An offer of appointment to any successful candidate is conditional upon:

- Receipt of written references, covering the last 5 years of employment, confirmed by telephone where possible.
- Verification of the candidate's identity.
- A basic, standard, or enhanced Disclosure and Barring Service check, depending on role, which includes a check of the Barred Lists, including an overseas 'Certificate of Good Conduct' or equivalent.
- Evidence of permission to work for those who are not nationals of a European Economic Area country.
- Verification of qualifications.

All checks will be:

- Confirmed in writing.
- Documented and retained on the personnel file (subject to restrictions on the retention of information imposed by Disclosure and Barring Service regulations)
- Followed up where they are unsatisfactory or where there are discrepancies in the information provided.

## **Due diligence**

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process reviews the controls undertaken by the supplier to ensure they comply with our Procurement Policy and that they act ethically and within the law.

Due diligence arrangements also apply to subcontractors, delivery partners, and employers engaged in supporting funded provision or work-based learning. Where appropriate, the organisation may request confirmation of relevant policies, procedures, or compliance statements as part of its ongoing assurance processes.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

Additional procedures ensure that this statement is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Company activities.

Our procurement processes support and comply with a commitment to reinforcing ethical values across all our procurement and supply practices, which includes modern slavery and human trafficking, in line with CIPS' Code of ethics. Knowledge is refreshed and updated as part of ongoing CPD.

This policy forms part of SNE's wider commitment to safeguarding, ethical conduct, and regulatory compliance and will be reviewed annually, or sooner where legislative, operational, or risk-related changes require.