

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Our commitment

Innovate Awarding is committed to understanding all potential modern slavery risks relating to its business and to ensuring the business and its supply chains are free of modern slavery and human trafficking.

As a market leading Awarding Organisation and End-point Assessment provider, we acknowledge our responsibility to take a robust approach to slavery and human trafficking and to comply with all principles of the Modern Slavery Act 2015.

2. Objectives

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This policy sets out how Innovate Awarding aims to prevent opportunities for modern slavery to occur within the Company or any areas of our supply chain.

3. Key Contacts

The responsibility for the prevention of modern slavery and for ensuring the policy and its implementation complies with our legal and ethical obligations, rests with the senior team.

Line managers are responsible for the implementation of this policy and for ensuring those who report to them understand and comply with this policy.

This policy can be accessed by all employees at Innovate Awarding through our intranet.

4. Scope

This policy applies to all Innovate Awarding employees and (casual) workers (permanent and temporary) as well as to anyone working for or on behalf of Innovate Awarding including freelancers, suppliers, contractors and business partners.

5. Organisation and Structure

We are a market leading UK based Awarding Organisation and End-point Assessment provider who offer qualifications and end-point assessment across a range of business sectors.

The scope of our business is within the United Kingdom only.

Given the nature of our supply chain, we do not deem any activities or countries in which we operate, as high risk in relation to modern slavery.

6. Relevant Policies

Innovate Awarding operates the following policies 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

Innovate Awarding is committed to operating business in an open and accountable way. We encourage our employees, customers and business partners, to come forward and voice concerns about any aspect of our work both in relation to our direct activities or our supply chains. We recognise that employees are often the first to realise that there may be something seriously wrong happening within the business. 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 employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise with their Line Manager, the HR Department or use our confidential helpline.

Employee Code of Conduct

This policy provides guidance about how we strive to live our Company values and sets out how we expect our employees to behave and conduct themselves whilst at work. It also sets out what you can expect from us as an employer and highlights where you can find further information about work-related issues.

Supplier Code of Conduct

Innovate Awarding is committed to behaving and acting in an ethical manner and expects all its Suppliers to adhere to these standards. The Supplier Code of Conduct sets out the standards and principles we expect from our suppliers, contractors and business partners.

Corporate Social Responsibility

Innovate Awarding is committed to being a responsible business, both in how we work with our learners, clients and employees as well as in terms of how we contribute to the wider community and the world around us. Our Corporate Social Responsibility policy outlines how we operate as a socially responsible company.

All the documents and policies referred to within this Policy can be found on our intranet.

7. Due Diligence

Innovate Awarding are comfortable from our due diligence that there is no evidence of modern slavery or human trafficking in our organisation.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

Should suppliers not meet our standards as set out in this policy and our code of conduct, we would consider invoking sanctions including the termination of the business relationship.

8. Performance Indicators

We will implement the following key performance indicators:

- All team members will read and understand the policy and where appropriate, receive additional training.
- All suppliers will provide such co-operation and information that Innovate Awarding reasonably requires in order to confirm compliance with our code of conduct, including, but not limited to, providing written confirmation as to compliance with the Innovate Awarding code of conduct, on request, allowing Innovate Awarding to carry out (or commission others to carry out) compliance checks and audits.

9. Review

The policy and procedure will be periodically reviewed on an annual basis. The next review will be in October 2023.

10. Additional Support

If you require any additional support or advice, please contact your line manager or a member of the HR Team.