



Modern Slavery Policy

Document Number 135

June 2020 V6

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SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Smart Awards has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
2. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Smart Awards has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OFQUAL GENERAL CONDITIONS

3. C1.1: Where an awarding organisation arranges for a third party to undertake, on its behalf, any part of the development, delivery or award of qualifications which the awarding organisation makes available, or proposes to make available, the awarding organisation must – (a) ensure that the arrangements which it establishes with that third party enable the awarding organisation to develop, deliver and award qualifications in accordance with its Conditions of Recognition, and (b) monitor and, where appropriate, enforce such arrangements so as to ensure that it is able to develop, deliver and award qualifications in accordance with its Conditions of Recognition.

SQA ACCREDITATION PRINCIPLES

4. Principle 4. The awarding body shall continually review the effectiveness of its business services, systems, policies and processes.

RESPONSIBILITIES

5. This policy applies to all persons working for Smart Awards or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, instructors, assessors, contractors, external consultants, third-party representatives and business partners. Smart Awards has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Smart Awards has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

R	Responsibilities	The person who actually carries out the process or task. The person is responsible for action/implementation. Responsibilities can be shared											
A	Accountabilities	The person who is ultimately accountable for the process or task being completed and who has the authority to make decisions, yes or no authority and veto power. Responsible person (s) are accountable to this person. Only one A can be assigned to a task											
C	Consulted	The person to be consulted prior to a final decision or action (two-way communication). People who are not directly involved with carrying out the task but are consulted with.											
I	Informed	Anyone whose work depends on the process or task and who has to be updated about the progress after a decision or action has been taken (one-way communication).											
POLICIES		BOARD	CEO	MD	OPS DIRECTOR	QUALITY PORTFOLIO MANAGER	STANDARDS COMPLIANCE OFFICER	QUAL ADMIN OFFICER	IT CONSULT	FINANCE AUDITOR	EQA	NOPS BOARD	CENTRES
Awarding Policies and Process													

Modern slavery	C	A	R	R	C	R	C	I	I	C	I	R
ASSOCIATED POLICIES												
Awarding Policies and Process												
Antibribery and corruption												
Safeguarding												
Recruitment and section												
Whistleblowing												
Holiday/Sickness Cover												
The MD, CEO and Operations Director cover holiday/sickness and absenteeism for areas where the person is responsible for action/implementation of a task. The MD, CEO and Operations Director hold company wide experience to be able to carry out these tasks and hold no conflicts of interest.												

OUR BUSINESS

6. Smart Awards is a National Accrediting Body that develops, and certifies cost effective, quality assured programmes of learning that meet the needs of telecommunications, smart metering and the highway industries.

OUR POLICIES

7. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:
- Modern Slavery Policy. This policy sets out Smart Awards stance on modern slavery and explains how centres can identify any instances of this and where they can go for help.
 - Recruitment and Selection Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
 - Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
 - Anti-Bribery and Corruption Policy. This policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Smart Awards business is conducted in a socially responsible manner.

OUR SUPPLIERS

8. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our modern-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.
9. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:
- They have taken steps to eradicate modern slavery within their business
 - They hold their own suppliers to account over modern slavery
 - (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)

- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

10. We may terminate the contract at any time should any instances of modern slavery come to light

COMMUNICATION AND POLICY AWARENESS

11. We regularly communicate our procurement, so individuals understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

OUR PERFORMANCE INDICATORS

12. We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

MODERN SLAVERY POLICY

13. Section 54 of the Modern Slavery Act requires organisations that supply goods or services and have a consolidated global turnover of £36 million per annum or more to prepare a slavery and human trafficking statement (a 'Statement') for each financial year. All bodies corporate and partnerships that meet the turnover requirement will be caught, regardless of where they are incorporated, if they carry on any part of their business in the UK. Notably, organisations that primarily pursue a charitable or educational aim have not been excluded from the requirements.

14. Smart Awards do not meet the requirements in the Act, for example by having a turnover of £36m or above, however, we still choose to voluntarily produce a 'slavery and human trafficking statement'. We have taken this decision as we may be asked by those supplying goods above the 36m threshold, especially when bidding for contracts. Therefore, Smart Awards voluntarily has in place a statement as a means of managing these requests and providing a level of assurance to our customers.

SCOPE

15. Smart Awards publish its slavery and human trafficking statement on its website. The purpose of this measure is to increase transparency and it is vital that the statement can be easily accessible by anyone who wants to see it. Smart Awards statement is reviewed and published annually.

16. Smart Awards policies set the tone in assessing, preventing and mitigating the risk of and working to influence and remedy modern slavery in their supply chains and organisation. Clear organisational policies demonstrate our commitment to this issue and ensures that appropriate and coordinated action is taken throughout the business.

DEFINITIONS

17. Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.
18. *Definition of Slavery and Servitude* Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.
19. *Definition of Forced or Compulsory Labour* Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.
20. *Definition of Human Trafficking* An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.
21. *Definition of Child Labour* Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery.
22. *The Worst Forms of Child Labour* The worst forms of child labour are very likely to constitute modern slavery. The worst forms of child labour are defined by article 3 of ILO Convention No. 182 as: a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international

treaties; d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

23. *Behaviour constituting modern slavery* Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.

COMPLIANCE WITH THIS POLICY

24. The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for or under Smart Awards control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

POLICY PRINCIPLES

25. Smart Awards will ensure where possible:

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains
- All working or representing Smart Awards avoid any activity that might lead to, or suggest, a breach of this policy
- All working or representing Smart Awards read, understand and comply with this policy
- We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of modern slavery

BREACHES OF THIS POLICY

26. Smart Awards may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy. We encourage individuals to raise concerns about any issue or suspicion of modern slavery in any parts of Smart Awards business or supply chains at the earliest possible stage. Smart Awards encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

REPORTING

27. Smart Awards will provide an annual statement in compliance with the Modern Slavery Act 2015, following each financial year.

28. The statement will be published on Smart Awards website.

- UK Modern Slavery Adult Victim Support Providers
- England and Wales The Salvation Army 0300 303 8151
- Scotland Trafficking Awareness Raising Alliance (TARA) 0141 276 7724 Migrant Helpline 07837 937737 or 07789 791 110
- Northern Ireland Migrant Help 013 0420 3977 or 07766 668 781 (for male potential victims of human trafficking) Women's Aid 028 9024 9041 (for female potential victims of human trafficking)
- Modern Slavery Helpline The NGO Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

REVIEW OF THIS POLICY

29. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance from the regulators, SQA Accreditation or Ofqual.