

POL-IPS-017

Rev: 2.0

Valid until: 31/10/2025

Modern Slavery and Human Trafficking Policy Statement

Author or latest reviewer name	Mary Holmes	Date: 01/10/2022
Authoriser name	QSIM	Date: 27/04/2023

Modern slavery is a crime and a violation of fundamental human rights. It takes differing forms, such as slavery, servitude, forced and compulsory labour and human trafficking, which are the deprivation of a person's liberty by another to exploit them for personal/commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

IPS International Limited (IPS) is a specialist Apprenticeship training provider in engineering and manufacturing, business skills and health and social care. Some of our apprenticeship training is subcontracted to other specialist training providers. Apprentices are all in employment with their employer placement and their apprenticeships are conducted under rules set out by the Education and Skills Funding Agency. Separately IPS also delivers commercial engineering maintenance training to a wide range of manufacturers throughout the UK.

We are committed to ensuring there is transparency in our own business and our approach to tackling modern slavery throughout our supply chains will be consistent with the Modern Slavery Act 2015. We will expect the same high standards from all our subcontractors, suppliers and business partners and we have appropriate due diligence processes for detecting instances of slavery and human trafficking

Our employees undergo face to face selection interviews, checking identification, right to work documentation checks, background reference checks and Disclosure and Barring Service checks. We have an effective Safeguarding process for young and vulnerable learners and encourage disclosure and whistleblowing.

Our subcontractors undergo a rigorous due diligence to ensure they are appropriate and have proper processes and procedures including DBS and Safeguarding.

Employers who employ apprentices and receive training from IPS International undergo a health and safety placement (HASP) check that ensures apprentices are placed in a safe workplace. This HASP also checks that employers know about Safeguarding, Equality and Diversity and have policies that deal with bullying and harassment. All apprentices undergo eligibility checks including identity and right to work and are required to have a written contract of employment. IPS carries out frequent checks to ensure that these are in place. IPS communicates regularly with employers about their obligations concerning the National Minimum Wage and the Apprenticeship Minimum Wage. Monthly face to face monitoring of apprentices ensures that frequent opportunities are available to detect modern slavery and human trafficking.

Suppliers of services and goods to IPS will be monitored and where instances of modern slavery or human trafficking are discovered IPS will report immediately to the appropriate authorities.

As part of our initiative to identify and mitigate risk we do not and will not support any business that does not comply with the Modern Slavery Act 2015 or has employment practices or is found to have mistreated employees or apprentices or conducts themselves in a way that we deem inappropriate.



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This statement is supported by the following polices:

Grievance and Whistleblowing policies – these policies allow employees, learners and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Staff Code of Conduct – this code forms part of the safeguarding process, and sets out the behaviour expected of staff employed by IPS, who aim to maintain the highest standards of employee conduct and ethical behaviour when managing its business.

Safeguarding and Preventing Extremism Policy – this sets out our approach to dealing with instances of child exploitation and human trafficking and the partnerships on which we rely to help us do this, this also aims to identify children, young people and vulnerable adults at risk of harm or abuse and how to respond to this.

Recruitment policy – this policy ensures that IPS follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

Financial processes – these regulations provide the practical and ethical standards by which IPS manages its financial operations.

Bullying and harassment policies – these are designed to help ensure that our staff and customers are treated with both dignity and respect.

Risk management policy – this keeps all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).

Business Conduct Policy – this sets out what we do to ensure that our business operates ethically and with integrity

Mary Holmes

Director