

# Modern Slavery Policy

## General Policy Statement

In accordance with the Modern Slavery Act 2015, Quest Training Ltd (Quest Training) is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively 'human trafficking and slavery'). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Quest Training is satisfied from its own due diligence there is no evidence of any act of modern-day slavery or human trafficking within its own organisation.

Quest Training has an appointed Designated Safeguarding Lead, who will take steps to ensure not only its own compliance, but also that these requirements are followed by stakeholders, subcontractors and /or business partners (collectively called "stakeholders" within this Policy).

Quest Training will not knowingly support or deal with any businesses involved in slavery or human trafficking.

## Definition:

**Human Trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat, or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

**Forced Labour:** all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

**Harmful Child Labour:** consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

This also covers exploitation which includes:

- Sexual exploitation
- Removal of organs
- Securing services by force, threats or deception
- Securing services from children and vulnerable persons

Modern Slavery is a hidden crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, debt bondage, child labour, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain and is extremely widespread across the globe.

Most children reported as victims of Modern Slavery, are in the 16-17-year-old age category, although can be of any age, including the very young.

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals, to ensure their functions and any services that they contract out to others, are discharged, having regard to the need to safeguard and promote the welfare of children.

We are committed to safeguarding our apprentice/learners and staff, improving our practices and policies both internally and throughout our supply chain, to combat modern slavery.

#### Requirement from Stakeholders:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Will comply with the minimum age requirements prescribed by applicable laws.
- Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Will abide by applicable law concerning the maximum hours of daily labour.
- Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK
- Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to Quest Training, also adhere to these requirements.

Any breach of this Policy (including by a stakeholder) can be reported (in confidence, if required) by contacting Quest Training's Designated Safeguarding Lead.

Quest Training takes any breach of this Policy extremely seriously. We have a zero-tolerance approach to slavery in all forms from Quest, and stakeholders.

Stakeholders who are found to have, or be engaging in human trafficking and slavery, or who refuse to co-operate with any audit, to verify compliance with this Policy, will be liable to have any agreements, arrangements or other contracts with Quest Training terminated immediately, without compensation.

If a stakeholder to Quest Training is found in violation of this Policy, Quest Training will take prompt action, which may include terminating any agreement, arrangement, or other contract with that stakeholder. It shall also take other remedial steps via the

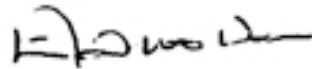
Designated Safeguarding Lead to address the violation and seek to prevent its reoccurrence.

#### Related Policies:

- Safeguarding Policy
- Equality Diversity and Inclusion Policy
- Prevent and British Values Policy
- Health and Safety Policy
- Health and Well-being Policy
- Whistleblowing Policy
- E-Safety Policy
- Low Level Policy

This Policy will be reviewed as part of Quest Training's yearly quality assurance cycle.

I confirm that this Policy is authorised and approved by Elaine Wain – Strategic Director.



Date: 30<sup>th</sup> August 2023

Review date: August 2024