**Anti-slavery and Human Trafficking Policy**

1. **Policy**

Modern slavery is a crime and a violation of fundamental human rights. Cogent Skills (Cogent) does not tolerate any form of modern slavery and human trafficking within our company or within our supply chains.

Cogent is committed to taking all practical steps to prevent and detect non-compliance.

We expect all UK and non UK organisation’s which have, or seek to have, a business relationship with Cogent to act at all times in a way which is consistent with our anti-slavery and human trafficking values.

The Modern Slavery Act 2015 (the ‘Act’) prohibits all forms of modern slavery. Modern slavery is a term used to describe the criminal offences of slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common deprivation of a person’s liberty in order to exploit them for personal or commercial gain. Any person found guilty of committing an offence under the Act may be sentenced to life imprisonment. More information about the signs and features of modern slavery can be found at [www.modernslavery.co.uk](http://www.modernslavery.co.uk).

1. **Principles**

* The Finance and Business Functions Director is responsible for this policy and all documentation.
* Leadership and Management at all levels are responsible for ensuring that employees reporting to them understand and comply with this policy and are given adequate training.
* Cogent is committed to:
* Transparency of its anti-modern slavery practices;
* Acting ethically and with integrity in all business dealings;
* Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within the business or within the supply chain. We expect the same high standards from all suppliers and third parties.
* All requests for information from clients and customers should be sent to the Finance and Business Functions Director, who will respond in a timely manner.
* Cogent reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees’ contracts of employment.
* This policy covers the activities of the Cogent group of companies. It governs all business dealings and the conduct of all persons or organisation’s with whom Cogent contracts directly, or who it appoints to act on its behalf. This includes grant holders, suppliers and contracted companies.
* This policy applies to all employees.

1. **Procedures**
   1. **Modern Slavery Information**

* Modern slavery takes various forms including Slavery, servitude, forced and compulsory labour and human trafficking.
* There is no typical victim of modern slavery and some victims do not understand that they have been exploited and that there is help and support available. The following are some indicators that may indicate there is modern slavery:
* The employee is not in possession of their own passport or ID;
* The employee is acting as though they are being instructed or led by someone else;
* The employee allows others to speak for them;
* The employee is dropped off and picked up from work;
* The employee appears withdrawn or frightened;
* The employee does not seem to have friends or to interact with friends or family freely;
* The employee has limited social interaction or contact with people outside of their environment.
* The above list is not exhaustive and there may be other indicators that may point towards slavery. Equally, each item on the above list on their own does not necessarily constitute slavery. If someone is in doubt, please raise the concerns with a BU Leader or Director who will support with further investigation.
  1. **Modern Slavery Prevention**
* All those mentioned in section 2 must ensure that they read, understand and comply with this policy.
* All staff are responsible for preventing modern slavery and human trafficking from taking place within our organisation. All business activities must be conducted in a manner such that the opportunity for, and incidences of, modern slavery taking place are prevented.

**3.2 Modern Slavery Detection and Reporting**

* Any suspicion that modern slavery or human trafficking is taking place within our company or supply chains, must be reported to a Business Unit Leader or Director who will investigate further and report to the Finance & Business Functions Director.
* Cogent is committed to ensuring that no one suffers any detrimental treatment as a result of reporting internally in good faith their suspicion that modern slavery is, or may, be taking place within our organisation or supply chains.

**3.3 Investigation**

* The Finance and Business Functions Director or HR Director (as appropriate) are responsible for investigating any reported suspicion that modern slavery or human trafficking may be taking place with our organisation or supply chains. Where appropriate the investigation may be delegated.

**3.4. Case Conclusion**

* Any one mentioned within section 2 of this policy, who breaches this policy will either face disciplinary action, which could result in dismissal or appropriate action to cancel services provided.
* Cogent reserves the right to terminate its relationship with any individual or organisation with whom it contracts directly, or appoints to act on its behalf, where modern slavery is suspected.

**4. Associated Documentation**

* Cogent Slavery and Human Trafficking Statement