**Anti-slavery and Human Trafficking**

**Policy**

1. **Policy**

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

We are 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 us to always act 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 to describe criminal offences of slavery (refer to 3.1), all of which have in common deprivation of liberty and exploitation for personal or commercial gain.

Anyone 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.
* Leadership and Management at all levels are responsible for ensuring that colleagues understand and comply with this policy.
* This policy applies to all employees.
* We are committed to:
* Transparent anti-modern slavery practices.
* Acting ethically and with integrity in our business dealings.
* Implementing and enforcing systems and controls to ensure modern slavery is not taking place within Cogent or within our supply chain. We expect this high standards from all suppliers and third parties.
* All information requests from customers should be sent to the Finance and Business Functions Director, who will respond in a timely manner.
* We reserve the right to amend and update this policy as required. This policy does not form part of your contract of employment.
* This policy covers all activities within the Cogent group of companies. It governs all business dealings and the conduct of all persons or organisation’s with whom we contract directly, or who we appoints to act on our behalf. This includes grant holders, suppliers and companies.

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. The following are indicators of potential modern slavery practices:
* A colleague is not in possession of their own passport or ID.
* A colleague is acting as though they are being instructed or led by someone else.
* A colleague allows others to speak for them.
* A colleague is dropped off / picked up.
* A colleague appears withdrawn or frightened.
* The employee does not seem to have friends or to interact with friends or family freely.
* A colleague has limited social 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 you are in doubt, please raise concerns with your BU Leader or a Director who will investigate further.
  1. **Modern Slavery Prevention**
* You must ensure that you read, understand and comply with this policy.
* Cogent provide training to all managers on Anti-Slavery and Human Trafficking, this training can be requested from the HR department, for any new managers joining.
* You are responsible for preventing modern slavery and human trafficking from taking place within our company. 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 Cogent or our supply chains, must be reported to your Business Unit Leader or Director who will investigate further and report to the Finance & Business Functions Director.
* We are committed to ensuring that no one suffers detrimental treatment as a result of reporting concerns in good faith. If you have a suspicion that modern slavery is, or that it may be taking place within Cogent or our supply chains, please seek advice.

**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**

* If you breach this policy, you may face disciplinary action, which could result in dismissal or appropriate action to cancel services provided.
* We reserve the right to terminate our relationship with any individual or organisation with whom we contract directly, or appoint to act on our behalf, where modern slavery is suspected.

**4. Associated Documentation**

* Cogent Slavery and Human Trafficking Statement.
* Disciplinary Policy.
* Whistleblowing Policy.