



Anti-Slavery and Human Trafficking Policy

Version 2025/2026

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Next Review Date	July 2026
Reviewed By	Jas Mann

Amendments Made Since Last Review Date	None - content reviewed – no amendments made
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Anti-Slavery and Human Trafficking Policy

1.0 Scope and Purpose

- 1.1 The scope of this policy is to set out Challenge-trg Skills' stance on Modern Day Slavery and Human Trafficking in the workplace and ensure the communication of this policy to all employees within the company.
- 1.2 Challenge-trg Skills is vehemently against slavery and is committed to preventing acts of slavery and human trafficking from occurring within its business, it imposes those same high standards on its contractors, suppliers and other business partners.

2.0 General Principles

- 2.1 Challenge-trg Skills acknowledge the provisions of the Modern Slavery Act 2015 and will ensure transparency within its organisation and with suppliers of goods and services to the organisation. Challenge-trg Skills 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
- 2.2 As part of Challenge-trg Skills due diligence processes into slavery and human trafficking the supplier approval procedure incorporates a review of the controls undertaken by the supplier.
- 2.3 Imported goods from sources outside the UK and EU are potentially more at risk of slavery and human trafficking issues therefore the level of management control required for these sources should be continually monitored.
- 2.4 The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- 2.5 Challenge-trg Skills will undertake responsibility for implementing this policy statement and its objectives.
- 2.6 This policy will be reviewed and published annually.

3.0 Policy Statement

- 3.1 Challenge-trg Skills has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business.
- 3.2 This Anti-Slavery and Human Trafficking policy statement is the principal articulation of the Challenge-trg Skills stance on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the organisation.
- 3.3 Our stated Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.
- 3.4 We are proud of the conditions of employment for all our employees throughout Challenge-trg Skills.

Given the nature of our business, our senior management team considers there is minimal risk approximating that, either within Challenge-trg Skills or through our supply chains supporting our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking.

3.5 The employment and procurement practices operated within Challenge-trg Skills ensure that we are rightly viewed as an excellent and supportive employer. As an organisation that operates as a purchaser of goods or services, we expect a high level of ethical conduct from those businesses with which we do business within our supply chain.

4.0 Organisation Structure

4.1 Challenge-trg Skills is a training services company helping people transform their lives and businesses, offering training and education services and developing opportunities to seek employment.

We help people move into work by enabling them to gain the skills they need to make them employable, providing them with opportunities to seek meaningful employment. We do this as a prime provider the Education & Skills Funding Agency and the European Social Fund. We also work with employers who we can offer recruitment and training solutions for their business.

4.2 Our supply chain enables us to help more people into work. Our partners are established public and private sector organisations that help us to deliver and maintain high quality job coaching, recruitment and skills development services.

The aim of our partnerships is to join forces and expertise in offering a service that can seamlessly fit the needs and requirements of jobseekers, employers and skills learners alike. We work with a variety of established partners who are committed to the same high standards. This is validated through our due diligence processes and for those organisations that meet the threshold of obligations under the section 54 (1) of the Modern Slavery Act 2015 we will support our partners to understand those obligations and statutory duties.

5.0 Due Diligence and Implementation Processes

5.1 As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different sectors of Challenge-trg Skills.

These include the policies and procedures in the following areas:

- Anti-Bribery Policy
- Equality and Diversity Policy
- Fraud and Malpractice Policy
- Recruitment and Selection Policy
- Safeguarding Policy
- Violence at Work Policy
- Whistleblowing Policy

Challenge-trg Skills also articulates a series of employee rights and benefits available to employees during Employee Inductions and Welcome Events and individual contracts of employment for each member of staff.

5.2 Challenge-trg Skills through its Departmental Managers has procedures and functions to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.

So far, we have:

- Made our staff aware of the Modern Slavery Act, including its definitions of slavery and human trafficking.
- Told staff what to do if they suspect a case of slavery or human trafficking.
- Contacted suppliers and partners in potentially higher risk categories to check what assurance arrangements they have in place.
- Commenced a revision of our procurement contracts and related documents to include prohibitions in respect of slavery and human trafficking and compliance with the legislation reviewed our Whistleblowing Policy to include contact details.
- The partner Group joined the “Stronger Together” initiative, providing information to higher risk groups.

We currently curate weekly reports:

- To identify duplicate bank account details.
- To identify duplicate postal addresses.
- To identify duplicate next of kin details.
- To identify duplicate contact numbers.
- To identify duplicate email addresses.
- The above procedures are designed to:
 - Identify and assess potential risk areas in our business and supply chains.
 - Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
 - Monitor potential risk areas in our business and supply chains.
 - Provide adequate protection for whistle-blowers.
 - Make it easy for whistle blowers to contact us confidentially and anonymously.

6.0 Training

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of Challenge-trg Skills’ training and information materials.

7.0 Legal and Regulatory Purpose of this Statement

This statement is made with regard to the obligations arising under section 54(1) of the UK’s Modern Slavery Act 2015 (the Act). Accordingly this statement should be considered to constitute the Slavery and Human Trafficking statement for Challenge-trg Skills for the 2020 financial year and all future financial years until it may in future be modified or amended.

If you have any information or concerns in relation to slavery or human trafficking, please contact the Operations Director or Group HR Service on 0203 642 0624.