



# Modern slavery statement

## Modern Slavery Act 2015

The Modern Slavery Act 2015 came into effect on 29th October 2015. The Act seeks to address the role of businesses in preventing modern slavery from occurring in organisations and their supply chain. It requires businesses in any sector which meet defined criteria to produce a slavery and human trafficking statement each financial year. For further information on the act please [click here](#).

## What we have done

The Ingeus Group of companies, which operates across 10 countries, is committed to eradicating modern slavery and human trafficking. Our efforts include the following:

### Ingeus UK

Ingeus UK has written policies which serve to address the requirements of the Modern Slavery Act 2015. These include:

## 1. Code of Conduct

Our [Code of Conduct](#) is embedded within our organisation and serves to ensure that all employees are aware of their responsibilities and commitment to operating ethically, and assist them in making the right choices. It includes information on our company values, human rights and safeguarding which align closely to the requirements of modern slavery.

## 2. Equality and diversity

Our Equality and Diversity policy is in place to ensure that we treat people fairly and with respect. This policy fosters a culture which safeguards our customers and employees, affording dignity and respect to all.

## 3. Safeguarding

Our Safeguarding policy sets out the legislative requirements to provide a duty of care, promote positive wellbeing and provide a clear process for escalating concerns to protect the welfare of individuals. This includes modern slavery concerns. We have a Modern Slavery Prevention and Reporting procedure across our UK business. All colleagues are aware of the Safeguarding Policy and associated reporting procedure.

## 4. Recruitment and selection

Our recruitment process is in place to ensure that we employ people who demonstrate our values, have high ethical standards, are the right people for the right role and fundamentally, meet the requirements of being able to work in the UK.

## UK supplier network and delivery partners

## **Suppliers of goods and services**

The Ingeus supplier network includes suppliers of services and goods both in the UK and beyond. Each of our supplier network organisations is responsible for meeting legislative and regulatory laws that govern them. However, Ingeus has communicated with all of its current supplier network organisations in the UK to highlight the requirements of the Act and emphasise that we will only work with organisations that share our commitment to preventing modern slavery.

## **Partners**

Prior to working with organisations, we complete due diligence activities which include a review of key policies. In addition, we have issued mandatory evaluation questionnaires to understand their current controls and processes, aimed at eradicating modern slavery and human trafficking.

We have developed training materials on modern slavery for our partners to supplement their current processes. We have also delivered training to some partners directly and we have plans to do more of this in 2018.

## **Ingeus Group**

To assess processes in relation to identifying, reporting and eradicating modern slavery each entity in our wider group of companies' we have:

1. Communicated the requirements of the Act and our commitment in this important area to senior leaders across our network.

2. Issued mandatory evaluation questionnaires to understand and assess current controls and process in place to eradicate modern slavery and human trafficking.
3. Undertaken a compliance review process with senior leaders across our network. This review included a focus on policies and practices in place to prevent harm to individuals and modern slavery.

## **What we will do in 2018/19**

Our work in this important area will continue through:

1. The delivery of compulsory online training on the Modern Slavery Act to all employees in the UK, including how to identify and escalate any concerns.
2. Continuing to review and develop our policies, processes and controls which support our commitment to eradicating modern slavery across our network.
3. Conducting appropriate audits to evaluate processes in place to eradicate modern slavery including self-assessment audits.
4. Providing our UK partners with training materials on modern slavery in order to support their understanding of the requirements and how to deal with concerns.
5. Where we believe it is necessary, delivering training directly to our UK partners.
6. Ingeus will develop and update this statement to meet the requirements of the Modern Slavery Act on an annual basis.
7. Our statement has been approved by an Ingeus Board Director.

Jack Sawyer

CEO, Ingeus Group

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For employers

For partners



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Modern Slavery Statement

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