

## **Modern slavery and human trafficking statement**

### **Introduction**

This statement sets out ITN Mark Education's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2018 – 30 September 2019.

As part of the staffing solutions and outsourced services industry, ITN Mark recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

ITN Mark Education is absolutely committed to preventing slavery and human trafficking in its corporate activities, and operates a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

### **Organisational structure and supply chains**

This statement covers the activities of ITN Mark Education and its subsidiaries:

ITN Mark Education operates in one primary market:

- Education Recruitment
  - The nature of the supply chain is principally related to the provisions of recruitment and outsourcing as well as suppliers used for sourcing office equipment.

The organisation currently operates across the UK and 1 office operating outside of the UK.

- We use Risk Management processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking in particular, geography, sector and cost of supply.

## *Responsibility*

Responsibility for ITN Mark Education's anti-slavery initiatives is as follows

- **Policies:** Reviewing and putting in place the relevant policies in relation to slavery and human trafficking is the responsibility of the Director.
- **Investigations/due diligence:** The Director is responsible for compliance in their business unit and for supplier relationships.
- **Training:** We will provide training to relevant members of staff at induction and throughout employment where relevant to ensure that they understand the risks of modern slavery infiltrating our business or supply chains. Effective operation of our policies and procedures are aimed at mitigating this risk.

### **Relevant policies**

ITN Mark Education operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** ITN Mark Education encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, ITN Mark Education. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** ITN Mark Education's code makes clear to employees the actions and behaviour expected of them when representing ITN Mark Education. ITN Mark Education strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers policy** ITN Mark Education uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### **Due diligence**

ITN Mark Education undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. ITN Mark Education's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- Engage with our suppliers both to convey to the Anti slavery and human trafficking policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
- Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### **Communication and awareness of this policy**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

The policy will be communicated to all employees across the business and training provided where appropriate. Employees will be expected to familiarise themselves with the statement.

The Company statement will be communicated on our company website and intranet page.

Signed: 

Name: CHRIS HINTON

Position: CFO

Date: 22<sup>nd</sup> October 2018