

MODERN SLAVERY AND HUMAN TRAFFICKING

STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act

2015 and relates to actions and activities for the financial year ending 31 March 2022.

HGV TRAINING SERVICES LIMITED ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

HGV TRAINING SERVICES LIMITED has business operations in the United Kingdom.

We operate in the Transport and Logistics sector. The nature of our supply chains is as follows: HGV Training Services Ltd is involved in the purchase of goods and services to support the delivery of our business activities. We aim to be responsible for delivering value to our clients, whilst observing purchasing practices that align with our corporate social responsibility aims and objectives. The purpose of this policy is to set out the Company's duties and responsibilities in upholding CSR policies throughout our supply chain and / or where our business has control or influence. We will disseminate this policy to our clients, suppliers and staff to ensure its effective implementation.

For more information about the Company, please visit our website: insite.training

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

Recruitment and selection policy - In order to safely recruit, Insite will:

- Thoroughly screen and check staff qualifications and suitability to work prior to appointment.
- Undertake DBS checks at the appropriate level for all successful applicants appointed into positions dealing with children, young people or vulnerable adults.
- Maintain records of all DBS details on a single, central register. Follow an appropriate referencing procedure, not accepting references from inappropriate sources.

Safeguarding policy - Insite will:

- Establish, maintain and promote a clear and accessible procedure for escalating all safeguarding concerns Designated Person.
- Provide all staff with access to training materials and guidance on handling safeguarding incidents and creating a safe and welcoming environment for learners.

- Monitor the safety of the environment and the management of safeguarding and learner welfare (including use of the escalation process) as a part of a rigorous Quality Management procedure.
- Provide all staff with training and guidance on compliance with the Prevent Duty, and support in undertaking Prevent Risk Assessments and action planning where required.
- Monitor progress toward action plans associated with the Prevent Risk Assessment and any other welfare related risk assessment/s.
- Ensure that confidential, detailed and accurate records of any safeguarding concerns are maintained and securely stored. Adopt a safe recruitment, selection and pre-employment practice, including the vetting of staff and volunteers.
- Ensure that all staff are aware of their individual responsibility to provide a safe and inclusive environment.
- Commit to the ongoing review of the success and impact of safeguarding practice, as a part of the

Quality Assurance process.

- Address, without delay, failure on the part of any member provider or staff member to comply with the policy and procedures – which may ultimately result in dismissal/exclusion from the organisation or a termination of contract.
- Implement fair and robust procedures in place for dealing with allegations of abuse or inappropriate conduct by staff or any individuals associated with Insite.
- We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.
- External supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Creating an annual risk profile for key suppliers.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.
- We do not consider that we operate in a high-risk environment because The business operates in this risk level environment because all of our supply chain is based in the UK and in low-risk industries.

- We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 6 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 100% of suppliers each year.

Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high- risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

Darren Clapich, Director

HGV TRAINING SERVICES LIMITED (Insite)