# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

## The Initiative Training GP Limited

Company number 06204390

Version 2.1 | Effective 23 July 2026

# Document control

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| **Document title** | Anti-Slavery and Human Trafficking Policy |
| **Policy owner** | Directors of The Initiative Training GP Limited |
| **Approved by** | Managing Director |
| **Version** | 2.1 |
| **Effective date** | 23 July 2026 |
| **Next review** | July 2027, or earlier if legislation, guidance, business activities or risk exposure materially change |
| **Applies to** | The Initiative Training GP Limited and any trading styles used by the Company, including Initiative Training Oracle |
| **Classification** | Public |

**Important distinction.** This is the Company's operational policy. It is not an annual slavery and human trafficking statement under section 54 of the Modern Slavery Act 2015. The Company is not currently within the statutory £36 million turnover threshold, but adopts this policy voluntarily and will reassess its reporting position if its circumstances change.

# Contents

# 1. Policy statement

1.1 The Initiative Training GP Limited (the Company) has zero tolerance for modern slavery, human trafficking, forced labour, servitude and exploitative recruitment practices. The Company is committed to acting ethically, lawfully and with integrity in its business activities and relationships.

1.2 The Company expects the same standard from every director, employee, worker, consultant, contractor, associate, subcontractor, supplier and business partner acting for or with it.

1.3 The Company will take a proportionate, risk-based approach to identifying, preventing, mitigating and responding to modern slavery risks within its own activities and supply chain.

1.4 No commercial objective, operational pressure, deadline or instruction justifies conduct that breaches this policy.

# 2. Purpose and legal framework

2.1 The purpose of this policy is to set clear standards, allocate responsibilities and establish practical arrangements for identifying and responding to modern slavery risks.

2.2 Modern slavery is used in this policy as an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. It includes exploitation that a person cannot freely refuse or leave because of threats, coercion, deception, abuse of vulnerability or abuse of power.

2.3 The principal UK legislation is the Modern Slavery Act 2015. Other legal duties may also apply, including employment, safeguarding, health and safety, immigration, procurement, criminal and whistleblowing law.

2.4 Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations carrying on business in the UK, supplying goods or services and having annual turnover of £36 million or more to publish an annual modern slavery statement. Although the Company is not currently within that threshold, modern slavery risk exists in organisations of every size and this policy is adopted as a matter of good governance and responsible business conduct.

2.5 This policy should be read alongside the Company's whistleblowing, safeguarding, recruitment, supplier, data protection and disciplinary arrangements where applicable.

# 3. Scope

3.1 This policy applies to:

- all directors and employees, including temporary, fixed-term and part-time personnel;
- consultants, associates, agency workers, interns, volunteers and self-employed persons engaged by the Company;
- contractors and subcontractors delivering services for or on behalf of the Company;
- suppliers, labour providers, training partners, professional advisers and other business partners; and
- all Company activities in the United Kingdom and overseas, so far as the Company can reasonably influence or control them.

3.2 Compliance with this policy is a condition of engagement or business relationship where incorporated into the relevant contract, terms of business, purchase order or supplier requirements.

3.3 This policy does not require any person to place themselves or another person at risk. Immediate safety and the welfare of potential victims take priority.

# 4. Responsibilities

## 4.1 Directors

The Directors have overall responsibility for this policy, for ensuring appropriate resources and oversight, and for deciding whether concerns should be referred to law enforcement, safeguarding authorities, clients, insurers or other competent bodies.

### 4.2 Managing Director

The Managing Director is responsible for maintaining the policy, receiving escalated concerns, appointing an appropriate investigator where required, recording actions and reporting material issues to the Directors.

### 4.3 Contract and project leads

Anyone selecting, appointing or managing consultants, subcontractors or suppliers must apply proportionate due diligence, remain alert to warning signs, document material concerns and escalate them promptly.

### 4.4 Everyone covered by the policy

All persons within scope must read and comply with this policy, complete any required training, cooperate with due diligence and investigations, and report suspected breaches without delay.

## 5. Risk assessment and due diligence

5.1 The Company will assess modern slavery risk in a manner proportionate to the nature, location, value and complexity of the activity or supply relationship.

5.2 Factors that may increase risk include:

- operations or suppliers in jurisdictions or sectors associated with forced labour, weak labour enforcement, conflict, corruption or displacement;
- extensive subcontracting, informal labour, labour brokers, migrant labour, temporary labour or unclear recruitment arrangements;
- unusually low prices, unrealistic delivery times or unexplained gaps in pricing;
- recruitment fees, deposits, debt arrangements, deductions from pay, retention of identity documents or restrictions on movement;
- poor visibility beyond the immediate supplier, refusal to provide information, inconsistent records or unexplained changes in ownership or workforce;
- workers appearing fearful, controlled, isolated, underpaid, inadequately housed or unable to speak freely.

5.3 Depending on the assessed risk, due diligence may include:

- confirming identity, ownership, location, business activities and use of subcontractors or labour providers;
- requesting relevant policies, licences, certifications, workforce information or evidence of compliance;
- checking adverse information and credible public reporting;
- asking suppliers to confirm that they prohibit modern slavery and apply equivalent expectations to their own supply chains;
- including suitable contractual obligations, rights to request information, audit rights and termination rights;
- conducting enhanced review, interviews, site visits or independent checks where risk or suspicion justifies them.

5.4 Due diligence is not a one-off exercise. Higher-risk relationships must be reviewed at appropriate intervals and when material changes or concerns arise.

5.5 Where a concern is identified, the Company will consider the potential effect of its response on the victim. Immediate and automatic termination may sometimes increase harm or conceal exploitation. The Company will therefore consider remediation, corrective action, referral and responsible disengagement on a case-by-case basis, without compromising safety or legal obligations.

## 6. Standards expected of the Company and its supply chain

6.1 The following conduct is prohibited:

- slavery, servitude, forced or compulsory labour, human trafficking or knowingly facilitating such conduct;
- violence, threats, intimidation, deception, coercion or abuse of vulnerability to obtain or retain labour or services;
- withholding passports, identity documents, wages or personal property as a means of control;
- charging unlawful or exploitative recruitment fees, creating debt bondage or requiring deposits that restrict a worker's freedom to leave;
- restricting lawful freedom of movement, communication, association or termination of employment or engagement;
- using child labour contrary to applicable law or exposing children to hazardous or exploitative work;
- retaliating against anyone who raises a genuine concern or assists an investigation.

6.2 Suppliers and contractors are expected to provide lawful terms, pay and working conditions, maintain accurate records, respect workers' rights, and take reasonable steps to prevent modern slavery within their own operations and supply chains.

6.3 No person may knowingly ignore, conceal, destroy or falsify information relating to a suspected breach.

## 7. Warning signs

7.1 Indicators may include, but are not limited to, a person who:

- appears frightened, withdrawn, injured, controlled or unable to speak without another person present;
- does not possess or control their passport, identity documents, bank card, wages or personal belongings;
- is transported to and from work in a controlled manner or lives in overcrowded or unsuitable accommodation linked to the work;
- works excessive hours, receives little or no pay, has unexplained deductions or believes they owe a debt to a recruiter or employer;
- cannot freely leave their work or accommodation, has restricted movement or has been threatened with violence, dismissal, immigration consequences or harm to family;
- provides a rehearsed or inconsistent account, appears unaware of their address or terms of employment, or has had those arrangements made by someone else.

7.2 A single indicator does not prove modern slavery. Several indicators, the surrounding circumstances or a credible disclosure may justify urgent action.

## 8. Raising and reporting a concern

8.1 Any concern, suspicion or disclosure must be reported promptly. A person does not need proof and should not delay while attempting to investigate the matter personally.

8.2 Internal reporting routes are:

- the person's immediate manager, contract manager or project lead, where appropriate;
- the Managing Director; or
- email to james.gribben@initiativetraininggroup.com, marked 'Private and confidential - modern slavery concern'.

8.3 Where the concern involves the normal reporting contact, or the person reasonably believes that route is unsuitable, the concern should be raised directly with another Director or an appropriate external body.

8.4 If anyone is in immediate danger, a crime is in progress or urgent police assistance is required, call 999. Non-emergency concerns may be reported to the police on 101 or to the UK Modern Slavery and Exploitation Helpline on 08000 121 700.

8.5 Do not confront a suspected exploiter, alert them to a report, promise a particular outcome, remove a potential victim without competent advice, or take action that may destroy evidence or increase danger.

## 9. Protection, confidentiality and anonymous reports

9.1 The Company will support anyone who raises a genuine concern in good faith or on the basis of a reasonable belief, even if the concern is not substantiated.

9.2 No person will be subjected by the Company to dismissal, loss of work, threats, intimidation, victimisation or other detrimental treatment because they raised a genuine concern or assisted an investigation.

9.3 Concerns will be handled sensitively and information will be shared only with those who need it for safety, investigation, legal compliance or fair process. Complete confidentiality cannot be guaranteed where disclosure is required by law or necessary to protect a person.

9.4 Anonymous reports will be considered. Providing contact details may, however, make it easier to clarify information, provide updates and conduct an effective investigation.

9.5 A person will not be penalised merely because a concern proves mistaken. Knowingly false, malicious or deliberately misleading allegations may result in disciplinary or contractual action.

9.6 Statutory whistleblowing protection depends on the facts and legal tests. Nothing in this policy prevents a person from seeking independent advice or making a disclosure to an appropriate prescribed person or competent authority.

## 10. Response and investigation

10.1 On receiving a concern, the Company will, so far as appropriate:

- record the concern and acknowledge it promptly where contact details are available;
- assess immediate danger, safeguarding needs, potential criminality and the risk of retaliation or loss of evidence;
- take proportionate interim steps to protect potential victims and preserve relevant information;
- appoint a suitably independent and competent person to assess or investigate the matter;
- consider referral to the police, Modern Slavery Helpline, safeguarding authorities, regulators, clients or other competent bodies;
- keep the reporting person informed where it is lawful and appropriate to do so;
- record findings, decisions, remedial actions and lessons learned.

10.2 Investigations will be fair, proportionate and completed as soon as reasonably practicable, having regard to safety, complexity, confidentiality, evidence, legal privilege and the involvement of external authorities.

10.3 The Company will process personal information in accordance with applicable data protection law and will retain records only for as long as reasonably necessary.

## 11. Breaches of this policy

11.1 A breach by an employee may result in disciplinary action, including dismissal for gross misconduct where justified.

11.2 A breach by a consultant, contractor, supplier or other business partner may result in corrective action, suspension, termination of the relationship, exclusion from future work, recovery of losses and referral to a competent authority.

11.3 Decisions will take account of the seriousness of the conduct, the safety and wishes of potential victims, the need to preserve evidence, legal obligations and the risk of causing further harm.

## 12. Training and communication

12.1 The Company will communicate this policy to relevant personnel, suppliers and contractors at the start of the relationship or engagement and reinforce it where risk or circumstances justify.

12.2 Training or briefing will be proportionate to role and exposure. It may cover warning signs, recruitment and supplier risks, reporting routes, victim-centred response and the need not to investigate or confront suspected exploiters personally.

12.3 Persons responsible for supplier selection, overseas delivery, travel, accommodation, subcontracting or labour arrangements may receive enhanced guidance.

## 13. Monitoring and effectiveness

13.1 The Directors will monitor the implementation and effectiveness of this policy using information appropriate to the size and risk profile of the Company.

13.2 Measures may include:

- completion of risk assessments and proportionate supplier checks;
- use of contractual clauses and supplier confirmations;
- training or briefing completed by relevant personnel;
- number, nature and resolution of concerns raised;
- corrective actions, referrals, remediation and lessons learned;
- changes in countries, services, clients, subcontracting or supply chains that alter the risk profile.

13.3 The absence of reported concerns will not, by itself, be treated as proof that no risk exists. The Company will remain alert to under-reporting, weak visibility and changes in operating conditions.

# 14. Review and approval

14.1 This policy will be reviewed at least annually and sooner where there is a material change in legislation, official guidance, business activities, supply chains, client requirements or identified risk.

14.2 The Directors may amend this policy at any time. The current approved version will supersede previous versions.

14.3 If the Company becomes subject to section 54 of the Modern Slavery Act 2015, or elects to publish voluntarily, it will prepare a separate annual slavery and human trafficking statement covering the relevant financial year and obtain the required approval and signature.

**Signed for the Company**

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| **Name** | James P. Gribben |
| **Position** | Managing Director |
| **Date** | 23 July 2026 |

# Appendix A - External reporting and advice

Use the internal route where it is safe and appropriate, but do not delay urgent reporting. External organisations may change their contact arrangements, so check current official information where practicable.

| Route | When to use it | Contact |
|---|---|---|
| **Emergency services** | Immediate danger, crime in progress or urgent assistance | Police: 999 |
| **Police non-emergency** | Suspected crime or modern slavery where there is no immediate danger | Police: 101 |
| **Modern Slavery and Exploitation Helpline** | Confidential information, advice, support or reporting | 08000 121 700<br>modernslaveryhelpline.org |
| **Protect** | Independent and confidential whistleblowing advice | 020 3117 2520<br>protect-advice.org.uk |
| **Prescribed persons and bodies** | Where a worker wishes to disclose to the appropriate regulator or authority | Current list on GOV.UK |

## Reference sources


- Modern Slavery Act 2015
- Home Office, Transparency in supply chains: a practical guide, updated 1 December 2025
- GOV.UK, reporting labour exploitation and modern slavery
- GOV.UK, whistleblowing guidance and prescribed persons


*This policy is intended as a practical corporate governance document. It should be reviewed by the Company's legal adviser if the business structure, workforce, turnover, jurisdictions, public procurement exposure or supply chain risk materially changes.*