

MTCnovo Slavery and Human Trafficking statement

Financial year ending 31 December 2017

1. Introduction

This Slavery and Human Trafficking statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”). It outlines our key commitments across the business, including; management of our supply chain, policies and our approach. We work with a series of delivery partners that share our vision and approach to supporting vulnerable people, reducing reoffending and protecting the public.

We recognise our responsibility for upholding and protecting the human rights of our employees and other individuals with whom we deal in our operations. We welcome the opportunity we have to contribute positively to global efforts to ensure that human rights are understood and observed. We believe that through the processes we are looking to enshrine will encourage a culture of respect for and promotion of human rights. We expect the same commitment from our suppliers and for them to flow down that commitment through their Supply Chain.

Our service delivery focus on public protection; diversity and inclusion; and the belief that everyone has a chance to change their lives to become a valued citizen in the community. As such, MTCnovo acknowledges its commitment to compliance with the Act and to preventing modern slavery and human trafficking within its workforce and supply chain across its business. In this Statement (2018), for the period 1 January 2018 – 31 December 2018, we set out how we will enhance our delivery towards such commitment.

2. Organisational Structure

MTCnovo is a joint venture owned by MTC Training Corp, an American management training provider, and novo, a company consisting of 75% ownership by Amey and a number of community organisations.

MTCnovo delivers probation services on behalf of the Ministry of Justice through our Community Rehabilitation Companies in both Greater London and Thames Valley as well as operating a secure training centre, Rainsbrook, for young persons in Rugby. Each business is led by a Director who reports into the MTCnovo Managing Director and the MTCnovo Board. To deliver successfully, each business relies on a breadth of suppliers for both corporate products and services and frontline services to our service users.

MTCnovo business is predominately managed by our own staff. There are a very few activities contracted to suppliers who are in the main, not always, charity based organisations. MTCnovo do not operate outside of UK and do not have any suppliers that are based outside of UK. We therefore believe that our exposure to the risks of modern slavery is low within our own business and supply chain. However, this assessment is kept under continuous review to confirm if circumstances change requiring the company of any additional actions.

3. Our Supply Chain

Our supply chain consists of two types of suppliers; tier one suppliers, largely engaged in helping MTCnovo deliver rehabilitation services. The tier two suppliers are the ones mainly providing services that would be classified as overheads e.g. stationery, advisors utilities etc.

All procurement of suppliers and services are undertaken by procurement specialists within the central procurement function. Some of the services procured from tier 2 suppliers are undertaken within the business units. Our aim is to build a long term sustainable relationship encouraging collaborative working and good industry practices.

4. Our policy and approach to Slavery and Human Trafficking

MTCnovo is fully committed to ensuring there is no modern slavery or human trafficking in any part of our business and our supply chain with zero tolerance for non-compliance.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships. We are implementing and enforcing effective systems and controls to address and avoid slavery or human trafficking in our supply chain. The following policies, and supporting guidance, are relevant to slavery and human trafficking, and are available on request:

- Procurement Policy
- Recruitment Policy
- Inclusion Policy
- Health and Safety Policy
- Supplier Governance and Management Policy.

Our policies are made available to all employees via the internal intranet. MTCnovo has an effective grievance process in place to cover any concerns within the business and/or the supply chain.

All managers are notified of any changes to the policies and are required to cascade the updates to all team members who do not have access to the electronic communication channels. This includes non-office based employees, who are able to access a range of HR guidance and policies from a dedicated internal website.

Suppliers are expected to provide information such as proof of insurance, accreditation and their Health and Safety Policy. Suppliers are required to demonstrate competence within their particular field of expertise, such as via accreditations to relevant bodies.

5. Due Diligence Process for Slavery and Human Trafficking

MTCnovo manages risks across the company through a combination of policies, procedures and training. Existing policies and practices are being reviewed and updated and standard form contracts developed to ensure compliance with the Act.

As part of the review we are looking to introduce various policies including a Supplier Code of Conduct and Policies which will require to:

- Promote our values through our supply chain.
- Promote Modern Slavery awareness and guidance on how to reduce the risk of Modern Slavery across our Procurement and Supply Chain teams.
- Improve our modern slavery risk assessment via due diligence for new and existing suppliers.
- Provide copies of relevant policies and their own slavery and human trafficking statement from all suppliers.
- Assess any new suppliers for compliance with following criteria:
 - No forced labour or human trafficking is practiced in their business
 - A fair wage is paid
 - No discrimination is practiced
 - Working conditions are safe and hygienic.

A failure to comply with the above will be an absolute bar to pre-qualification as a supplier.

With most of our existing suppliers regular performance management meetings are held and as part of policies review the slavery and human trafficking will be on the agenda for discussion and for our assurance that they are in compliance with the Act.

6. Training

To ensure our commitments outlined in this Statement remain top of mind throughout our business, we must continuously measure the effectiveness of our approach and provide regular training for our employees. MTCNovo provides web based training to a wider group of staff who are likely to be in a position to identify and address potential modern slavery risks. This includes all people managers as well as the procurement team.

7. Next steps

The measures stated above are a continuous process and a review of the effectiveness of these measures will be further developed during the year. Furthermore, we intend to conduct a periodic review of those measures to ensure a compliance and a continuous improvement.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2017.