



UK ASBESTOS TRAINING ASSOCIATION

POLICY

MODERN SLAVERY

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MODERN SLAVERY **POLICY**

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A) ORGANISATION

This statement applies to UK Asbestos Training Association (referred to in this statement as 'UKATA'). The information included in the statement refers to the financial year ending 31/03/2021.

B) ORGANISATIONAL STRUCTURE

UKATA is a leading authority on asbestos training, a not for profit association established in 2008 with a set purpose in mind: to be recognised as the asbestos industry's most eminent training association.

Without in any way restricting the powers of the association, the objects of the association include but are not limited to establishing, setting, verifying, auditing and maintaining appropriate standards for, and promoting industry best practice amongst asbestos training providers in the United Kingdom including British Crown Dependencies and the British Overseas Territories and such other locations as the Board may agree appropriate from time to time.

Located in Chesterfield, Derbyshire, UKATA operates from one main building and currently has 11 employees. Although the association has one centralised base, the association has in excess of 190 members who are located throughout the United Kingdom.

UKATA is governed by a board of directors who are all volunteers, each with their own management style. They bring a diverse wealth of knowledge to the table, as well as offering their valuable time voluntarily for the good of the association.

The office team comprises of eleven employees who manage the day-to-day operational procedures under the leadership of the chief operating officer.

UKATA independent verifiers and auditors are appointed and satisfy the appointment criteria as set by the association.

The success of UKATA has been driven by industry, who acknowledge that the standards delivered by UKATA members offers assurance that delegates have received quality training from a provider who has proven competency at the highest level.

Demand for UKATA training is consistent throughout the year and has no dependency on seasonal activity.

The labour supplied to UKATA in pursuance of its operation is carried out in the United Kingdom.

C) DEFINITIONS

UKATA considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

UKATA acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. UKATA understands that this requires

an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

UKATA does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to UKATA in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. UKATA strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, UKATA's main supply chains include those related to:

- Facilities management services;
- Utilities;
- Communications and IT equipment services;
- Office equipment and supplies;
- Various professional services;
- Members of UKATA;
- Professional online software services, e.g. finance and HR.

F) POTENTIAL EXPOSURE

UKATA considers its main exposure to the risk of slavery and human trafficking to exist when dealing with suppliers of products and services, particularly those who have operations and suppliers in other territories. However, UKATA considers that we, and our suppliers, are not in industries with a high risk of modern-day slavery. In addition, our supply chains are all currently confined to the United Kingdom.

In general, UKATA considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

UKATA carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

UKATA has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, UKATA has taken the following steps to ensure that modern slavery is not taking place:

- Information uploaded on our website for members and visitors;
- Ensuring there is an effective Whistle Blowing Policy in place for employees should they wish to raise a concern;
- Reviewing our supplier contracts to include termination powers in the event, that the supplier is, or suspected, to be involved in modern slavery.

H) KEY PERFORMANCE INDICATORS

UKATA has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in UKATA or its supply chains:

- All staff to read the Modern slavery awareness booklet;
- All staff to complete the Border Force e-learning course;
- All staff to watch a range of videos on how to spot the signs of modern slavery, methods used by traffickers to exploit their victims, and victims accounts produced by The Gangmasters and Labour Abuse Authority (GLAA) and Independent Anti Slavery Commissioner (IASC);
- Conduct regular audits on each supply chain to ensure that, where applicable, they fully comply with their modern slavery statement.

I) POLICIES

UKATA has the following policies which further support its stance on modern slavery:

- Whistle Blowing Policy;
- Recruitment & Selection Policy.

J) TRAINING

UKATA provides the following training to staff to effectively implement its stance on modern slavery:

- E-Learning course on Modern Slavery at the point of induction then annually reviewed and updated along with the Modern Slavery statement.

K) SLAVERY COMPLIANCE OFFICER

UKATA has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to UKATA's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

L) IMPACT OF COVID19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for UKATA, as it did for others across the nation.

UKATA welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

UKATA concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, UKATA employees still had access to the grievance procedure to raise any concerns that they may have had.

M) RESOURCES

| Awareness | |
|--|---|
| Modern slavery awareness booklet | https://www.gov.uk/government/publications/modern-slavery-awareness-booklet |
| Border Force e-learning course | https://www.policingslavery.co.uk/ModernSlaveryBorderForce/presentation.html |
| Videos | |
| Spot the signs - Debt bondage | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-debt-bondage/ |
| Spot the signs - ID documents confiscated | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-confiscated-documents/ |
| Spot the signs - Poor or sub-standard accommodation | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-accommodation/ |
| Spot the signs - Horse Trading | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-horse-trading/ |
| Bartos – Victim of human trafficking | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-video-i-am-bartos/ |
| Top five signs of exploitation | https://www.gla.gov.uk/publications/resources/glaa-videos/video-top-five-signs-of-exploitation-to-look-out-for/ |
| Modern Slavery – Do the Right Thing | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-modern-day-slavery/ |
| What are you doing? | https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-what-are-you-doing/ |
| Guidance, Legislation, Research, Strategy, Statistics and Videos from The Independent Anti Slavery Commissioner (IASC) | http://www.antislaverycommissioner.co.uk/resources |

Signed: 

Name: Craig Evans

Position: Chief Operating Officer

Date: 01/04/2021