



Modern Slavery Act 2015 company statement

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Our commitment to the principles of the Modern Slavery Act 2015

Agility in Mind is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers. We conduct a risk assessment before procuring goods or services from any new suppliers to determine if there are any potential slavery risks in their supply chain. If we are not satisfied and we deem a risk of slavery is identified, due diligence checks are carried out. If we are not happy with the outcome of the due diligence checks, we will stop using the services of the supplier until we are satisfied they are compliant with the Act.

Our policies in relation to the Modern Slavery Act 2015

The following policies are available to all staff:

- Code of conduct
- Ethics policy
- Bullying and harassment policy
- Diversity and inclusion policy

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of [modern slavery guidance on the gov.uk website](#)
- ensuring that consideration of the modern slavery risks and prevention are added to our policy review process as an employer and procurer of goods and services
- making sure our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practice



Approval of Statement/Sign off

The board of Directors at Agility in Mind approved this statement on 19th April 2023.

Andrew Jones, CEO

Appendix 1 Risk Assessment for new suppliers

Does the organisation have an accessible Modern Slavery statement? (available on their website or on the gov.uk registry service)		Yes/No
Are they demonstrating compliance with the Modern Slavery Act 2015?		Yes/No
Are they legally required to have a statement? (turnover greater than £36m, corporate body or partnership, supply goods and services, run a business or are part of a business in the UK) If yes and a statement cannot be identified, supplier must complete due diligence check		Yes/No
If outside the UK, what measures do the supplier have in place in relation to modern slavery?		
Are the goods and services we wish to procure from the supplier susceptible to modern slavery?		Yes/No
Supplier accepted? If not, request completion of questionnaire		Yes/No

Appendix 2

Due diligence checks

Who should use the questionnaire?

The Questionnaire is designed to be used by when undertaking future procurements and when assessing modern slavery risks in existing contracts if the risk assessment determined the supplier to be of higher risk to modern slavery.

What if a supplier's answers to the questionnaire are unsatisfactory?

If a supplier's answers to specific questions do not seem satisfactory, this does not necessarily mean they should not be considered for the contract. Direct contact should be made with the supplier to understand why the answers were unsatisfactory.

Who will the answers of the questionnaire be made available to?

The results of this Questionnaire are confidential and will not be shared beyond Agility in Mind.

Supplier Questionnaire

Identifying modern slavery risks

This is a confidential Questionnaire for suppliers of goods and services. It is a tool to assist Agility in Mind and their suppliers to:

- identify and assess possible modern slavery risks in procurements
- identify mitigation efforts to combat the risk of modern slavery in procurements, and
- foster collaboration between us and our suppliers to address these risks.

Suppliers are asked to complete the Questionnaire honestly and with as much detail as possible. Completed Questionnaires will be confidential and will not be shared.

Modern Slavery and Trafficking Supplier Questionnaire

Contact details – Agility in Mind	
Organisation name	
Contact person	
Contact email	
Contact phone	

Please complete the below questions in as much detail as possible. Please return the completed Questionnaire to the nominated Agility in Mind contact (see above).

Contact details – Supplier	
Organisation name	
Organisation address	
Parent company	
Contact person	
Contact email	
Contact phone	
Date of Questionnaire completion	
Additional documentation	
Is your organisation required to report under the <i>Modern Slavery Act 2015</i> ? If so, please attach a copy of your modern slavery statement(s).	
Is there any other additional documentation you have attached to this questionnaire? If so, please list them here.	

Organisation structure

1.	<p>How much visibility does your organisation have over your supply chain? Please select one of the below and explain why you selected this option:</p> <p><input type="checkbox"/> High: You have mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain.</p> <p><input type="checkbox"/> Moderate: You have identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain.</p> <p><input type="checkbox"/> Developing: You have identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level.</p>
2.	<p>Does your organisation have a policy or policies in place to deal with modern slavery?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If the answer is yes, please provide details of, or a copy of, the policy or policies, including information on whether your organisation has a system to monitor compliance with these policies. If the answer is no, please provide information on what your organisation is doing, or plans to do, to manage modern slavery risks.</p>
3.	<p>Does your organisation have a person or team responsible for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors) that arise in relation to the goods or services that you deliver?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please describe the role and responsibility of that person/team below.</p>

Training

4. Are staff in your organisation trained on how to identify, assess and respond to modern slavery risks?
- Yes
- No
- If yes, please describe the nature of the training available and the positions or roles of staff that receive training. Please also specify whether training is also available to other organisations or staff in your supply chain. If no, does your organisation plan to introduce modern slavery risk training for staff?

Supplier engagement

5. Does your organisation perform screening of all prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?
- Yes
- No
- If yes, please describe how your organisation performs this screening. If no, does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future.

6. Are you aware of low-skilled migrant workers working in your organisation's supply chains?
- Yes
- No
- If yes, please provide information about where in your organisation's supply chain low-skilled migrant workers are employed.

Response processes

7.	How would your organisation respond to any allegation of modern slavery or substandard working conditions in its operations or supply chains?
8.	Does your organisation engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in its operations and supply chains? If so, please describe these activities. <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please describe these activities below.