

MTC

# Modern Slavery and Human Trafficking Statement

For year ending 31 December 2021

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## 1.0 Introduction

- 1.1 This 'Modern Slavery & Human Trafficking' statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") for the Financial Year ending 31 December 2021. It outlines Management & Training Corporation (UK) Ltd's commitment across its business and supply chain to combat modern slavery, trafficking and human exploitation; protecting the rights of the individuals we employ and serve in the community.
- 1.2 During the year ending 31 December 2021, our business centred on: managing offenders; providing rehabilitation services to have a positive impact on their lives and the community around them; protecting victims and the wider public; running the Rainsbrook Secure Training Centre; and providing security services to Initial Asylum Processing Centres. We are committed to delivering robust and professional criminal justice and immigration services in accordance with the principles of the Act and we remain focused on continuously strengthening compliance and service improvement in support of it.
- 1.3 We recognise our responsibility for upholding and protecting the human rights of our employees, service users, victims and wider individuals in the communities we serve. Our strategic and operational plans and processes aim to promote awareness amongst our employees and partners in a way which promotes a culture of respect for, and promotion of, human rights in everything we do and stand for.
- 1.4 We believe that everyone has the chance to change their lives for themselves, and those around them, for the better and to become a valued citizen in the community. As such, we acknowledge our obligations and commitment to complying with the Act and in preventing modern slavery, in all its forms, and human trafficking within our business, our supply chain and the communities we serve.

## 2.0 Organisation structure

- 2.1 Management & Training Corporation (UK) Ltd ("MTC") was formerly a joint venture partner in MTCnovo, but in early 2019 took sole ownership of the company to operate and expand its criminal justice services in the UK. Its parent company is Management & Training Corporation, based in the United States of America.
- 2.2 Until 25 June 2021 the MTC UK Group provided probation services to low and medium risk offenders on behalf of the Ministry of Justice, these services were renationalised on 26 June 2021. Until 31 December 2021, we also ran services, on behalf of the Youth Custody Service, at our Rainsbrook Secure Training Centre which provided custodial and education services to young persons, this contract was terminated by mutual consent effective 31 December 2021. From July 2021 MTC has provided security services at two Initial Asylum Processing Centres for the Home Office.

- 2.3 MTC manages its businesses through its Group Managing Director, supported by the corporate directors who collectively constitute the MTC Senior Leadership Team (SLT). The SLT reports into the parent company's Board.
- 2.4 During the year ended 31 December 2021, much of our frontline services were provided through our staff although we also contracted with a small number of significant 'partners' within our supply chain to deliver frontline services in both custodial and community settings. We also used a wider supply chain for corporate support services and engaged (non-contractually) with a wide array of local community-based service providers – most of whom were charities or voluntary and community social enterprises.
- 2.5 We did not operate outside of the UK and our supply chain was fully based within the UK also. While we believe this lowers our risk exposure to modern slavery and human trafficking, we do recognise the growing issue within the UK, particularly the potential links with the service users and communities we serve. As such, we remain committed to monitoring our business approach and operational delivery with regards to this.

## 3.0 Policy and approach

- 3.1 We are fully committed to ensuring there is no modern slavery or human trafficking in any part of our business or supply chain, adopting a zero tolerance approach to non-compliance.
- 3.2 We utilise a wide array of policies and processes to promote ethical behaviour and integrity across our business relationships. We continue to develop, implement and refine our systems and controls to address and avoid slavery and human trafficking. Such policies include:
- Business Case and Procurement policy.
  - Contract Management process.
  - Recruitment and Vetting policy.
  - Inclusion Policy and annual reporting in support of the Equality Act 2010.
  - Employee Code of Conduct.
  - Anti-Bribery and Corruption policy.
  - Discrimination and Harassment policy.
  - Whistleblowing policy
  - Together Programme and associated welfare initiatives to give employees a clear, safe channel to voice concerns.
  - Employee annual mandatory training which includes a module on Modern Slavery.
- 3.3 Our policies are promoted through a mix of employment starter packs; corporate inductions; and being readily available to employees through our intranet. Our Legal Register is owned by the Commercial Department, with our lawyers acting as custodian for legislative amendments – any changes are cascaded through to our policy makers and employees, as necessary.

- 3.4 Our key supply chain partners are required to provide assurance that their business approach is in line with our commitment to the Act through their values, policies and processes. They are expected to demonstrate their competence throughout the contract lifecycle (section 7) and we continue to develop our management approach in such regard.
- 3.5 Our key policies and expectations are complemented by mandatory annual training (section 6).

## 4.0 Operations

- 4.1 From 1 January 2021, until renationalisation on 26 June 2021, our probation services focused on reducing reoffending and public protection through:
- Managing the sentence of the Court.
  - Undertaking risk and needs assessments on all service users under our care.
  - Providing rehabilitative services to our service users.
  - Providing a duty of care through safeguarding boards and wider criminal justice partnerships, both statutory and non-statutory.
- 4.2 During the year ended 31 December 2021, our Rainsbrook Secure Training Centre provided custodial and education services to the young people staying there, this contract was terminated by mutual consent effective 31 December 2021.
- 4.3 During the year ended 31 December, MTC started providing security services to two Initial Asylum Processing Centres for the Home Office.
- 4.3 For our custodial business during 2021, we recognised that our service users may be perpetrators (and, in some cases, also victims) of modern slavery and human trafficking, most notably in terms of:
- Sexual exploitation,
  - Domestic servitude.
  - Child related crimes including sexual exploitation, illegal drug cultivation and distribution, and organisational theft.
  - Forced marriage and illegal adoption.
- 4.4 We equally recognised that our business also comes into contact with, and has a duty to protect, victims of our service users. In light of this, we particularly worked closely with the National Probation Service who advise the Court and support victims of crime.
- 4.5 For our Home Office business, we conduct our security services with a trauma-informed, welfare-centric approach, where direct engagement with the service user population is promoted extensively. We work closely with the Home Office and local Authorities to ensure we provide the best possible support for individuals we come into contact with. This includes dedicated training for behavioural interpretation / management, with a specific module on identifying and addressing suspected Modern Slavery issues. The Senior Management

Team receives thorough daily briefings any welfare concerns identified by our operational employees.

## 5.0 Employee vetting

- 5.1 All employees, whether temporary or permanent, are required to be vetted. The entry vetting for all employees is Disclosure & Barring Service (DBS) vetting, with frontline employees required to have Enhanced Disclosure & Barring Service clearance. Employees may also be required to attain Counter Terrorism Check (CTC), dependent upon role.
- 5.2 All employees, when recruited, are required to provide documented evidence including personal ID and proof of address.
- 5.3 Some specialist employees, such as Information Security and ICT, are also required to have Security Clearance (SC) or Department Vetting (DV).

## 6.0 Training

- 6.1 Our Learning Gateway team enables employees to develop the skills, knowledge, qualifications and understanding they need to deliver high quality services.
- 6.2 Learning and development plans form part of our employee annual personal development plans, consisting of a mix of mandatory annual and ad hoc voluntary training.
- 6.3 During the year ended 31 December 2021, training was provided through our on-line training portal, FUSE, and included a blend of mandatory training modules and complementary 'bite size' learning through podcasts/videos on modern slavery and corruption.

## 7.0 Procurement and supply chain

- 7.1 During the year ended 31 December 2021, our supply chain consisted of two types of suppliers – 'tier one' who largely deliver frontline services to our offenders service users and 'tier two' who typically provide support services.
- 7.2 Our Commercial Department managed the strategic development, leadership and oversight of procurement and contract management activity across our business. Procurement policies and practice promote our standards and expectations, complemented by robust standard forms of contract to establish and manage expectations of our supply chain with regards to the Act.
- 7.3 Our evaluation and due diligence process considers the suitability of suppliers through evaluation processes including, but not limited to, their commitment to inclusion, service delivery and quality, risk management, reputation and code of ethics/conduct. Key suppliers participate in regular contract management meetings which utilise our 'Contract Management Plan' tool.

## 8.0 Strategy 2022

8.1 We recognise that our policies, systems and processes need to evolve further to deliver against our commitment to the Act and, during the coming year 2022, we will have a particular focus on:

- Promoting employee and, ideally, supplier awareness through training on our learning platform as well as ongoing reinforcement via our communications and governance strategies;
- Reviewing our procurement and contract management policies to ensure they remain fit for purpose and further promote understanding and compliance with the Act; and
- Developing our corporate social responsibility policy which will include recognition of the Social Value Act 2012 and Modern Slavery Act 2015.

## 9.0 Attestation

This Statement is a fair representation of the business for the financial year ending 31 December 2021 and will be fully supported and promoted in 2022.

Approved by Management & Training Corporation (UK) Ltd's Board of Directors.

Signed on behalf of MTC:



**Ian Mulholland, MTC Managing Director**

Date: 24 June 2022