



# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

January 2023



# Modern Slavery & Human Trafficking Statement

## Key individuals involved in developing the process and policy

Name	Job Title
Nadine Searle	HR Business Partner

## Circulated to the following individuals for comments and approval

Name	Job Title
Wayne Taylor	Managing Director
Charlotte Walker	Director
Geoff Walden	Head of Group Operations & Services

## Draft and Issue Information

Subject/Topic	Comments
Date of Draft	25 Apr 2018
Date sent for review and approval	25 Apr 2018
Date approved	09/05/18
Approved by	WT, CW, GW
Date of Issue	10/05/19
Date for Review	May 2022
Where documents available and stored	<a href="#">Modern Slavery Statement V2 May 2019.docx</a>
Scope of Policy	All Staff
Feedback on implementation and content to	Nadine Searle, Group HRBP

## Version Control and Summary of Changes

Version Number	Date	Comments (description of change and/or amendments)
1.0	1 May 2018	This statement sets out the steps taken by all companies that form Citrus Group to prevent acts of modern slavery and human trafficking occurring in our business and supply chains.
2.0	10/05/19	Reviewed May 2019 – No Amendments other than inclusion of HRTD
3.0	12/05/2020	Reviewed May 2020 – no further amendments
4.0	12/05/2021	Review – no changes

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## 1.0 Introduction

1.1 This statement sets out Citrus Group’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

1.2 We are absolutely committed to carrying out our business operations responsibly and ethically and preventing slavery and human trafficking in any of our operational activities, and to ensuring that our supply chains are free from slavery and human trafficking.

1.3 All employees and representatives of our company are expected to report any concerns or suspicions they may have relating to potential slavery and human trafficking issues to their line manager or relevant contact within the company. All management are expected to act upon any such reports in line with this statement.

## 2.0 Definitions

Key Term	Definition
<b>All staff/employees</b>	All Citrus Group employees, regardless of which company and/or department they work for.
<b>Line Manager</b>	The manager that an employee reports directly to and who provides the day to day supervision of an employee in any of the Citrus Group companies.
<b>Representatives</b>	All sub-contractors that represent the company regardless of which company and/or department they are sub-contracted to.
<b>The Company</b>	Any company that forms part of the Citrus Group of companies, including Citrus Training Limited, Altitude Safety Limited, BBE Training Limited, BookMyCourse Limited and HR Training & Development Limited.
<b>Modern Slavery</b>	Term used to encapsulate the offences of slavery, servitude and forced or compulsory labour; and human trafficking as set out in the Modern Slavery Act 2015. More information is available at <a href="http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted">http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted</a>

## 3.0 Organisational Structure

3.1 The Group consists of five companies; Citrus Training, Altitude Safety, BBE Training, BookMyCourse and HR Training & Development. Our aim is that we keep our respective focuses in Safety Equipment, Education and Training, whilst also combining to provide an effective and complete safety and training solution, which is trusted by industry worldwide.

3.2 The Group’s Board and Senior Management Team have gained their experience and qualifications from years of dedicated service within the industry. It is with this experience, together

with our customer based key values and unique service levels, that Citrus Group continues to be the industry's leading provider.

3.3 The group has an annual turnover in excess of £10m.

### 4.0 Relevant Policies and Procedures

4.1 *Whistleblowing policy:* We encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

4.2 *Recruitment:* We have robust recruitment processes in line with UK employment laws, including: 'right to work' document checks, contracts of employment and checks to ensure everyone employed is 16 and above.

4.3 *Agency workers processes:* We will only use reputable employment agencies to source labour and we will verify the practices of any new agency before we accept any workers from that agency.

4.4 *Employee conduct:* We make clear to all employees the actions and behaviours expected of them when representing the Company in both the Employee Handbook and our Competency Framework. The Company strives to maintain the highest standards of employee conduct and ethical behaviour within our operations and our supply chain.

4.5 *Procurement:* Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

### 5.0 Due Diligence

5.1 The Company undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers.

5.2 Where possible we build long standing relationships with suppliers and make clear the standards of ethical business behaviour we expect from our suppliers.

5.3 When dealing with national or international supply chains, our point of contact is preferably with a UK company or branch of the supplier's company. We expect these contacts to have suitable policies and processes in respect of the requirements of the Modern Slavery Act 2015.

5.4 We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

### 6.0 Supplier Compliance

6.1 The varied nature of the products and services provided by Citrus Group means we purchase a wide variety of goods and services from suppliers within the UK and internationally.

6.2 We expect all those in our supply chain and contractors to comply with our zero-tolerance approach to modern slavery and human trafficking.

6.3 The Directors and the senior management team are responsible for compliance with this statement within their respective departments and their supplier relationships.

6.4 Citrus Group will not support or deal with any business that is knowingly involved in slavery and human trafficking.

### 7.0 Key Performance Indicators

7.1 We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains:

7.1.1 Use of recruitment and labour monitoring and payroll systems to ensure that all workers are employed in compliance with this policy and the relevant employment legislation and regulations; and

7.1.2 Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

7.2 We are keen to develop further KPIs in order to measure our effectiveness in ensuring that slavery and human trafficking is not taking place in any part of our business or our supply chains. As a result, the company is planning the following:

7.2.1 A requirement for all employees to have completed training on modern slavery and for new employees to be trained as part of the induction process.

7.2.2 Reviewing our existing supply chains by the next financial year whereby we will evaluate all existing suppliers in line with this statement.

7.2.3 Implementing an awareness-raising programme in the next financial year to raise awareness of modern slavery issues to all employees and contractors associated with the company. The communications used to raise awareness will include explanations of the basic principles of the Modern Slavery Act, how to identify and prevent slavery and human trafficking and what external help is available, for example, through the Modern Slavery Helpline.

### 8.0 Training and Supporting our Employees

8.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking within both our company and our supply chains, employees with either recruitment and employment of workers and/or procurement and purchasing responsibilities have been trained in relation to this policy.

8.2 All employees are required to read and acknowledge the Group's modern slavery policy.

8.3 Signposted all employees to [www.modernslavery.co.uk](http://www.modernslavery.co.uk) and [www.stronger2gether.org/](http://www.stronger2gether.org/) to provide them with useful information on how to recognise different types of slavery, how to spot the signs and details of the telephone helpline.

Signed:



**Wayne Taylor**  
 (Managing Director)

## Appendix A: Equality Impact Assessment

EIA for Identification (ID) Badge Policy	
<b>Stage 1</b>	Complete Draft Policy
<b>Stage 2</b>	Review the policy/process against its relevance to equality, diversity and inclusion (i.e. will this policy/process potentially impact on the equal treatment of employees). If 'No' then no further action is required and please note below in the appropriate box and sign and date. If 'Yes' continue with Stage 3
<b>Stage 3</b>	Screen the policy/processes to ensure that it does not directly or indirectly discriminate against any protected characteristic. Use the table below to consider this and inform changes to the policy/process.
<b>Stage 4</b>	Make amendments to the policy or identify any actions required. Note below if changes have been made.

Protected Characteristic	Is there any potential for discrimination against this group?	Actions required
Age	No	None
Disability	No	None
Gender reassignment	No	None
Marriage and civil partnership	No	None
Pregnancy & maternity	No	None
Race	No	None
Religion or Belief	No	None
Sex (gender)	No	None
Sexual Orientation	No	None

Statement	Comments	Name	Date
<b>This policy/process does not impact on the equal treatment of employees.</b>	Reviewed and measures in place to ensure equality is not impacted.	N Searle	10/05/19
<b>Amendments to policy/process.</b>	None required.	N Searle	10/05/19