

Modern Slavery & Human Trafficking Policy & Statement

Date of Issue: 1st June 2019
Reviewed: 01-10-2022

Reviewed by:



Jerry Froggett
Director &
Chief Executive Officer

Statement

This statement is made on behalf of Cintra Language Services Group Ltd pursuant to section 54(1) of the Modern Slavery Act 2015.

Whilst Cintra Language Services Group Ltd. currently has a turnover of less than an amount prescribed by regulations of the Secretary of State, as referred to in section 54 (2)(b) of the Modern Slavery Act 2015, it chooses to voluntarily make this statement in line with its own values as published online at www.cintra.org.uk/page/our-mission-and-values.

This statement applies to the financial year concluding 31st March 2022 and is the fourth statement of this type produced by the Group.

1) Our Business

Cintra Language Services Group Ltd comprises Cintra Interpreting and First Edition Translations Ltd. The Group is a leading UK language services provider, based in Cambridge, and with an outsourced call centre in Krakow, Poland.

The Group provides high quality language services for a range of clients, both in the United Kingdom and internationally. Within the United Kingdom, Cintra Interpreting provides services on contract and on an ad-hoc basis to the UK Public Sector, focussing on legal and justice related contracts, but also providing to the National Health Service and to Local Government. The Group also provides commercial services such as Interpreting, Translation, Localisation and attendant services within the UK and abroad.

2) Our Supply Chains

Cintra's supply chains include the outsourcing of IT services and other routine administrative and operational tasks. Outsourcing is undertaken with a mixture of United Kingdom and European Union based providers.

Linguists: 'Linguist' is the term used for Interpreters and Translators who provide language services assignments on Cintra's behalf. The majority of Cintra Linguists are self-employed contractors and can therefore be considered as outsourced personnel for the purposes of this statement.

3) Our Policy on Modern Slavery and Human Trafficking

This policy applies to all persons working for Cintra, or on its behalf, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Cintra has a 'zero tolerance' policy to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking activity in our supply chains or in any part of our business.

Our Policy reflects our key business value of treating all our clients, service users, Linguists and staff fairly and equitably, and to acting ethically and with integrity in all of our business relationships. To ensure the effectiveness of this policy, Cintra has, and will continue to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking is not taking place anywhere in our business or supply chains.

Cintra furthermore expects that its suppliers and business partners shall act to the same standards.

4) Due Diligence

As part of our initiative to identify risks arising in line with our zero-tolerance policy and to mitigate against potential risks, Cintra nominates senior representatives (normally department managers) throughout the business to monitor their designated area of responsibility. Representatives in turn report to the Chief Executive Officer who has the ultimate responsibility within Cintra for the delivery of the Company's policies and procedures.

We have in place a range of policies and systems across our business to help us to deliver this and other policies, both within our own business and for managing our business relationships with trading partners and our wider supply chains. Policies and systems include:

- ISO9001 Business Management System, specifically supplier management processes.
- Department Procedure Manuals (including procurement processes)
- Equality, Diversity & Inclusion Policy
- Bullying & Harassment Policy (protection against whistleblowing)
- Disciplinary Policy & Procedures
- Grievance Policy & Procedures

5) Risk Assessment within Supply Chain

Within the 2021-2022 Financial Year, Cintra has assessed the risk of Modern Slavery and Human Trafficking within its supply chain and considers the risk to be low. All contractors and suppliers must complete Cintra's Quality Supplier Questionnaire before commencing work and business. Quality Supplier Questionnaire covers topics such as Modern Slavery, Data Protection and ISO compliance.

6) Training

Cintra shall provide this policy to all staff, Linguists and directors as part of its induction process, and provides regular refresher training as the policy evolves at the conclusion of each financial year.

Suppliers and other sub-contractors will receive this policy along with our Quality Supplier Questionnaire as part of business commencement activities and within contractual documents.