

Modern Slavery Statement

This is Reflections Training Academy's statement made to the Modern Slavery Act 2015, which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy is to be reviewed each year in accordance with clause 6 of the Modern Slavery Act 2015.



Senior Manager Divisional Prevent / Safeguarding (DSL)

Reflections Training Academy

This policy was considered and adopted by the following Directors:



Clare Barrett
Company Managing Director



Lucy Agnew
Divisional Director of Training



Phil Davis
Director of Bristol Training Academy



Kate Sperring
Director of Next Level Training

| Policy Owner | Director sign off | Details of update | Date of Update | Version number |
|--------------|-------------------|------------------------|----------------|----------------|
| Jason Timms | Lucy Agnew | Policy creation | 29/06/20 | 01 |
| Jason Timms | Lucy Agnew | Policy review & update | 25/06/21 | 02 |
| Jason Timms | Lucy Agnew | Policy review & update | 10/06/22 | 03 |

Next review date: June 2023

Academy Policy and Statement

Reflections Training Academy inclusive of Next Level Training are committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.

We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure as far as reasonably practicable, slavery and human trafficking are not taking place anywhere in our supply chains.

Organisation structure

Reflections Training Academy provides education to a wide range of learners from age 16 to adult. The Training Divisions organisational structure is;

- Reflections Training Academy Birmingham – Delivering Hairdressing & Barbering apprenticeships, Traineeships and Study programmes across the West Midlands
- Reflections Training Academy Bristol – Delivering Hairdressing & Barbering apprenticeships, Traineeships and Study programmes across the West of England
- Next Level Training Delivering Business Administration, Customer Service, Digital Marketing and Team Leading apprenticeships, Traineeships and Study programmes across the West Midlands and the West of England

The Training Division has a number of stakeholders for various parts of the organisation.

These include:

- Apprentice employers
- External contractors including, cleaners/maintenance

Due diligence processes for slavery and human trafficking

Reflections Training Academy are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow Academy policies.

All team members employed within the organisation are asked to familiarise themselves with the policy at the start of their employment and are contractually obligated to adhere to the Academy policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern-day slavery or human trafficking within our own organisation.

We have a robust Safe Recruitment Process inclusive of the right to work in the UK checks that eliminate the possibility of any team member being employed who is a victim of Modern Slavery or Human Trafficking.

We have robust learner enrolment processes and checks in line with Government funding body requirements that ensure that it is extremely unlikely that any learner recruited would be a victim of Modern Slavery or Human Trafficking.

The organisation will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking.

Reflections Training Academy has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

The vast majority of the businesses sources are from inside the United Kingdom and as such are at lower risk of slavery and human trafficking issues.

The Academy also has a policy for the protection of whistle-blowers, to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.

Responsibility for the policy

Ultimate responsibility for our legal and ethical obligations within the business for the prevention of modern slavery rests with the Academy senior leadership team.

The implementation, monitoring and reviewing of this policy is the responsibility of the Safeguarding Team

Reporting modern slavery

Reflections Training Academy view Modern Slavery & Human Trafficking as a safeguarding area. The company safeguarding and whistleblowing policies provide guidance on how concerns can be communicated within the organisation.

To summarise, any suspected instance of modern slavery or human trafficking within the Academy or its suppliers must be reported to one of the Designated Safeguarding Leads via MyConcern, who will investigate and advise the appropriate people of any further actions.

Communication and awareness of this policy

This policy is displayed on the Academy websites, and communicated to all team members via the local policies are of MyConcern

Review

The Modern Slavery Statement and Policy will be reviewed annually by the safeguarding team in accordance with clause 6 of the Modern Slavery Act 2015