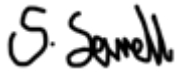


## Modern Slavery Statement

This statement acknowledges the Modern Slavery Act 2015 and sets out Reflections Training Academy's commitment to protecting learners from modern slavery and human trafficking. We treat modern slavery as a critical safeguarding issue and are committed to ensuring no learner under our care is a victim of slavery, trafficking, or exploitation.

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



**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	29/06/2020	01
Jason Timms	Lucy Agnew	Policy review & update	25/06/2021	02
Jason Timms	Lucy Agnew	Policy review & update	10/06/2022	03
Suzanne Sewell	Lucy Agnew	Policy review & update	21/6/2023	04
Suzanne Sewell	Lucy Agnew	Policy review & update	17/06/2024	05
Suzanne Sewell	Lucy Agnew	Policy review & update	18/06/2025	06
Kate Sperring	Lucy Agnew	Policy review & update	09/12/25	07

Next review date: December 2026

## 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 learners aged 16 to adult across our training divisions:

- **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 West of England

Our stakeholders include:

- Apprentice employers (workplace placement providers)
- External contractors (cleaners, maintenance providers)
- Funding bodies and regulatory authorities

### Our Zero-Tolerance Commitment

Reflections Training Academy has a zero-tolerance approach to modern slavery and human trafficking in all forms. We are committed to:

- Protecting all learners from exploitation, slavery, and trafficking
- Ensuring our recruitment processes identify and safeguard vulnerable individuals
- Working only with employers who share our commitment to preventing modern slavery
- Training all team members to recognise and report signs of modern slavery
- Acting immediately on any concerns raised

### Understanding Modern Slavery

Modern slavery encompasses:

- Slavery and servitude – ownership or control over a person
- Forced or compulsory labour – work under threat or coercion
- Human trafficking – recruiting, moving, or receiving people for exploitation
- Criminal exploitation – forcing people into criminal activity (including County Lines drug trafficking)
- Sexual exploitation – forcing people into sexual activity for commercial gain
- Domestic servitude – forced domestic work in private households

Young people and vulnerable adults are particularly at risk. Traffickers and exploiters use manipulation, coercion, threats, violence, and debt bondage to control their victims.

## **Learner Vulnerability and Risk Factors**

We recognise that some learners may be at increased risk of modern slavery and exploitation, including:

- Young people aged 16-18, particularly those who are looked-after or care-experienced
- Learners with Special Educational Needs and Disabilities (SEND)
- Learners facing financial hardship or homelessness
- Learners who are isolated from family or support networks
- Learners from communities where trafficking is more prevalent
- Young people involved with gangs or at risk of criminal exploitation
- Learners who have experienced previous abuse or trauma

## **Recognising Signs of Modern Slavery**

All team members are trained to recognise potential indicators of modern slavery, which may include:

### **Physical indicators:**

- Signs of physical abuse, malnourishment, or poor hygiene
- Lack of appropriate clothing or personal belongings
- Appearing tired, withdrawn, or fearful

### **Behavioural indicators:**

- Rarely allowed to travel alone or speak for themselves
- Reluctance to seek help or interact with authorities
- Seeming under the control of someone else
- Having limited freedom of movement
- Working excessive hours for little or no pay

### **Circumstantial indicators:**

- Living in poor or overcrowded accommodation
- Having no access to personal documents (passport, ID)
- Being moved frequently between locations
- Having unexplained wealth or expensive items
- Debt bondage (owing money they cannot repay)

### **Workplace-specific indicators:**

- Employer withholding wages or documents
- Learner working beyond contracted hours without proper pay
- Unsafe or exploitative working conditions
- Employer showing controlling behaviour toward the learner

## **Our Safeguarding Approach**

### **Learner Recruitment and Enrolment:**

We have robust learner enrolment processes aligned with government funding body requirements to ensure:

- All learners are enrolled legitimately and willingly
- Identity verification is completed appropriately
- Any concerns about a learner's circumstances are identified early
- Vulnerable learners are flagged for additional support
- Right to work/study checks are completed where applicable

## **Team Member Recruitment:**

We operate a robust Safe Recruitment Process including:

- Right to work in the UK checks for all team members
- Enhanced DBS checks for all staff working with learners
- References and employment history verification
- Interview processes that assess safeguarding understanding
- Induction training on safeguarding, including modern slavery awareness

This eliminates the possibility of employing anyone who may be a victim of modern slavery or who poses a risk to learners.

## **Learner Induction and Training:**

All learners receive:

- Safeguarding induction covering modern slavery and exploitation
- Information on how to report concerns safely
- British Values training, including understanding of human rights
- Regular reviews where safeguarding is discussed
- Pre-review opportunities to raise concerns confidentially

## **Team Member Training:**

All team members receive:

- Annual safeguarding training including modern slavery awareness
- Training on recognising signs and indicators of exploitation
- Clear procedures for reporting concerns
- Updates on emerging risks (e.g., County Lines, criminal exploitation)
- Role-specific training for Designated Safeguarding Leads

## **Employer Partnership Responsibilities**

Partner employers who provide workplace placements for our learners must:

- Provide a safe, non-exploitative working environment
- Pay learners fairly in accordance with employment law and apprenticeship regulations
- Not withhold wages, documents, or freedom of movement
- Treat learners with dignity and respect
- Allow learners to attend their off-the-job training
- Report any safeguarding concerns to Reflections Training Academy immediately
- Cooperate with investigations into any concerns raised

## **Our Due Diligence:**

Before placing learners with employers, we:

- Conduct health and safety assessments of the workplace
- Discuss safeguarding responsibilities with employers
- Provide employers with guidance on their safeguarding duties
- Require employers to agree to our safeguarding expectations
- Monitor learner wellbeing through regular workplace reviews

## **Ongoing Monitoring:**

- Tutor/Assessors conduct regular workplace visits and reviews
- Pre-reviews allow learners to raise concerns confidentially
- Quality assurance processes review safeguarding in placements
- Any concerns about employer practices are investigated immediately
- We will not work with employers who demonstrate exploitative practices

Reflections Training Academy will not refer learners to employers who:

- Operate discriminatory or exploitative practices

- Fail to meet safeguarding standards
- Show indicators of involvement in modern slavery
- Refuse to cooperate with safeguarding concerns

## Reporting and Responding to Concerns

Modern slavery concerns can be reported through multiple channels:

- MyConcern – our online safeguarding reporting system
- Designated Safeguarding Leads – contact details provided to all learners
- Any team member – all staff are trained to receive disclosures
- Whistleblowing Policy – for staff or partners who have concerns
- External agencies – Modern Slavery Helpline: 08000 121 700

When concerns are raised:

- The Designated Safeguarding Lead is notified immediately
- The concern is logged in MyConcern
- An assessment is conducted to determine the level of risk

Appropriate action is taken, which may include:

- Providing immediate support and safeguarding to the learner
- Contacting police or social services if criminal activity is suspected
- Referring to the National Referral Mechanism (NRM) for potential victims
- Working with multi-agency partners to protect the learner
- Removing the learner from an unsafe placement
- Ceasing to work with employers involved in exploitation

We will:

- Take all concerns seriously and act promptly
- Prioritise the safety and wellbeing of the learner
- Work with appropriate authorities and agencies
- Support victims throughout the process
- Maintain confidentiality where appropriate

## Supply Chain Due Diligence

The vast majority of our supply chain consists of UK-based businesses, which are at lower risk of modern slavery involvement. However, we remain vigilant and:

- Conduct due diligence on suppliers and contractors
- Expect suppliers to comply with our values and policies
- Review working conditions where practicable
- Will not knowingly work with any business involved in modern slavery
- Encourage suppliers to demonstrate their own anti-slavery measures

Our supply chain primarily includes:

- Cleaning and maintenance contractors
- IT and software providers
- Training resources and equipment suppliers
- Professional services (legal, HR, audit)

## Whistleblowing Protection

We have a Whistleblowing Policy that protects anyone who raises concerns about modern slavery within our organization or supply chain. We encourage:

- Team members to report suspicions or concerns
- Learners to speak up if they or someone they know is at risk
- Employers to report concerns they observe
- Contractors and suppliers to highlight issues

Whistleblowers will be protected from retaliation or detriment.

## **Responsibility and Governance**

Ultimate responsibility for modern slavery prevention rests with Clare Barrett, Company Managing Director

Implementation and monitoring is the responsibility of The Safeguarding Team (Designated Safeguarding Leads)

The Governance Board ensures:

- Policies are up to date and effectively implemented
- Safeguarding culture is embedded across all academies
- Modern slavery risks are identified and mitigated
- Staff training is delivered regularly
- Incidents are reviewed and lessons learned

All team members have the responsibility to:

- Complete modern slavery training
- Remain vigilant to signs of exploitation
- Report concerns immediately
- Follow safeguarding policies and procedures

All learners have the right to:

- Work and learn in a safe, non-exploitative environment
- Receive support if they have concerns
- Be believed and supported if they disclose exploitation