

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Policy Statement

Pier Training adopts a zero-tolerance approach to modern slavery, forced labour, servitude, human trafficking and exploitation. We are committed to acting ethically, with integrity and transparency in all our business dealings and relationships. We are dedicated to implementing effective systems and controls to minimise the risk of modern slavery occurring within our organisation or supply chains.

Modern slavery is a serious criminal offence and a violation of fundamental human rights. It can take many forms, including slavery, servitude, forced or compulsory labour, human trafficking, criminal exploitation and labour exploitation.

Pier Training is committed to complying with the principles of the Modern Slavery Act 2015 and ensuring that modern slavery and human trafficking have no place within our organisation, partnerships or supply chains.

Purpose of the Policy

The purpose of this policy is to:

- Ensure compliance with the Modern Slavery Act 2015.
- Prevent opportunities for modern slavery and human trafficking within our organisation and supply chains.
- Raise awareness amongst staff, learners, employers and stakeholders.
- Provide clear reporting routes for concerns regarding suspected exploitation.
- Promote a culture of openness and accountability.
- Protect vulnerable individuals from exploitation and abuse.

Scope

This policy applies to:

- All employees
- Directors and senior managers
- Apprentices and learners
- Volunteers

- Consultants and contractors
- Suppliers and subcontractors
- Business partners
- Anyone acting on behalf of Pier Training

All parties are expected to uphold the standards set out within this policy.

Definitions

Modern slavery is a criminal offence under the Modern Slavery Act 2015 and encompasses:

Slavery

The exercise of ownership over an individual.

Servitude

The obligation of a person to provide services imposed through coercion or force.

Forced or Compulsory Labour

Work or service extracted from a person under threat, coercion, intimidation or other forms of punishment.

Human Trafficking

The recruitment, transportation, transfer, harbouring or receipt of individuals through force, fraud, coercion or deception for the purpose of exploitation.

Criminal Exploitation

The coercion, control or manipulation of an individual into committing criminal activities for another person's gain.

Labour Exploitation

The exploitation of workers through unfair treatment, coercion, excessive work demands, withholding of wages or restriction of freedom.

Responsibilities

The overall responsibility for the prevention of modern slavery and the implementation of this policy rests with the Managing Director.

The Senior Management Team (SMT) is responsible for:

- Promoting awareness of this policy.
- Ensuring effective implementation.

- Monitoring compliance.
- Reviewing organisational risks.
- Taking appropriate action where concerns are identified.

All employees and stakeholders must:

- Understand and comply with this policy.
- Remain alert to indicators of modern slavery and exploitation.
- Report any concerns promptly.
- Cooperate fully with any investigations.

Pier Training encourages openness and will support anyone who raises genuine concerns under this policy without fear of retaliation or detriment.

Organisation and Structure

Pier Training is a UK-based independent training provider delivering apprenticeship and professional development programmes across England.

We specialise in healthcare, leadership, management, safeguarding and professional workforce development programmes and work with a diverse range of employers across public, private and voluntary sectors.

Supply Chains

Our supply chain may include:

- Awarding Organisations
- End-Point Assessment Organisations
- IT and Software Providers
- Professional Service Providers
- Recruitment and Marketing Providers
- Printing and Office Supply Companies
- Training Delivery Partners
- Consultants and Contractors

We also work with employers including:

- NHS Organisations
- Private Healthcare Providers

- Local Authorities
- Charities and Third Sector Organisations
- Small and Medium-Sized Enterprises (SMEs)

Pier Training is committed to ensuring that slavery and human trafficking do not occur within our business or supply chains.

Risk Assessment and Due Diligence

Pier Training undertakes proportionate due diligence when engaging suppliers, subcontractors, contractors and business partners.

Due diligence may include:

- Verification of business legitimacy.
- Review of safeguarding arrangements.
- Assessment of organisational policies and procedures.
- Assessment of reputation and legal compliance.
- Review of any known concerns relating to exploitation or unethical working practices.

Supply chain risks are monitored through:

- Supplier management arrangements.
- Internal audits.
- Safeguarding reviews.
- Complaints procedures.
- Whistleblowing reports.
- Quality assurance activities.

Where concerns are identified, Pier Training will investigate appropriately and may suspend or terminate relationships with organisations that fail to meet acceptable standards.

Reporting Concerns

Any person who suspects modern slavery, human trafficking or exploitation must report concerns immediately.

Concerns can be raised through:

- Designated Safeguarding Lead (DSL)
- Deputy Designated Safeguarding Lead

- Senior Management Team
- Managing Director
- Whistleblowing Procedures

Where appropriate, referrals may be made to:

- Local Safeguarding Partnerships
- Police
- Local Authority Services
- Relevant Regulatory Bodies

Modern Slavery Helpline

The Modern Slavery and Exploitation Helpline provides confidential advice and support:

Telephone: 08000 121 700

Website: www.modernslaveryhelpline.org

Policies Supporting this Policy

This policy should be read alongside the following organisational policies:

- Safeguarding Policy
 - Prevent Policy
 - Whistleblowing Policy
 - Code of Conduct Policy
 - Equality, Diversity and Inclusion Policy
 - Recruitment and Selection Policy
 - Complaints Policy
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Training and Awareness

Pier Training recognises the important role education and awareness play in preventing modern slavery.

To support this commitment:

- Modern slavery awareness forms part of staff induction.
- Safeguarding training includes modern slavery and exploitation awareness.
- Periodic refresher training is provided to relevant staff.

- Learners and apprentices are taught about modern slavery through safeguarding activities and curriculum delivery where appropriate.
- Staff are trained to recognise indicators of exploitation, trafficking, forced labour, labour abuse and criminal exploitation.
- Tutors are encouraged to utilise resources from the Independent Anti-Slavery Commissioner and other recognised agencies when delivering safeguarding awareness.

Pier Training particularly recognises its responsibility in supporting healthcare learners and apprentices to identify individuals who may be vulnerable to human trafficking, exploitation or abuse.

Breaches of this Policy

Any employee found to be in breach of this policy may be subject to disciplinary action in accordance with organisational procedures.

Where suppliers, contractors or business partners fail to meet the standards outlined within this policy, Pier Training reserves the right to terminate contractual arrangements and report concerns to the relevant authorities where appropriate.

POLICY REVIEW

Review Arrangements

The Managing Director is responsible for the implementation, monitoring and review of this policy.

The policy will be reviewed:

- Annually; or
- Earlier where legislative, regulatory or operational changes make this necessary.

The effectiveness of this policy will be monitored through:

- Safeguarding reviews
- Quality assurance activities
- Internal audit processes
- Staff feedback
- Training records
- Supplier due diligence activities
- Complaints and whistleblowing reports

Document Title:	Modern Slavery and Human Trafficking Policy
First Created:	March 2018
Updated:	June 2026
Version:	8
Checked by Senior Management Team:	June 2026
Final Approval by Managing Director:	June 2026
Signed by Managing Director:	Mohammed Syed
Revision Date:	June 2027