



KEIR TRAINING
& RECRUITMENT

Modern Slavery & Trafficking Summary

Compliant with Modern Slavery Act 2015

Keir Training & Recruitment Ltd.,

Effective from August 2022

Introduction

This statement sets out Keir Training & Recruitment Ltd, (Keir) guidelines to understand all potential risks related to its business and to ensure steps are maintained to prevent slavery and human trafficking. The guidelines are applicable to all Keir Training skills delivery, operations, staff and all representatives of the company. As well as outlining the duty to comply, these guidelines seek to educate everyone on identifying risks and subsequently reporting them.

Keir Training has a zero-tolerance approach to modern slavery and human trafficking and are fully committed to preventing slavery and human trafficking in its corporate activities and ensuring there is transparency across the business and supply chains.

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies which serve to address the requirements of the Modern Slavery Act 2015.

This statement governs our responsibilities within the organisation and ensures that all partners, sub-contractors and suppliers will promote these guidelines in line with our statement and legal requirements.

Our Policies

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective due diligence and contractual compliance. These include:

[Our Due Diligence Policy](#)

Keir Training conducts due diligence on all parties with which it enters into business relationships. Our due diligence policy reflects the fact that many of our operating environments are high risk for modern slavery and human trafficking. All information gathered from our due diligence is updated annually from all suppliers. We are also committed to carrying out spot-checks and 'deep dives' to gather further information about a supplier and their practices.

As part of the due diligence process Keir Training encourages all suppliers to have a Modern Slavery Policy or Guideline within their business as well as a Code of Conduct, which will be presented to contracting team prior to the granting of any awards. We are also committed to capacity building across our supply chains and working with suppliers to develop modern slavery policies where none exist and/or to strengthen policies as required. Where suppliers are not fully compliant, they are required to provide an action plan highlighting gaps in their process and corrective actions required. All gaps identified during due diligence are revisited after an agreed period against an action plan.

The following modern slavery and human trafficking questions are asked of all organisations:

1. Does the organisation have a statement / policy on modern slavery and human trafficking?
2. Please supply the following –
 - Details of any training undertaken for all staff
 - Details of procedures for dealing with cases
 - Details of practices/process of implementing the above, if none exist
3. How does the organisation flow down its statement / policy to all staff and supply chain and what checks are undertaken to ensure implementation?
4. What is the organisation's website address for details of the Modern Slavery Statement?
5. Have any of the organisation's employees being investigated under the Modern Slavery Act 2015?
 - Please provide accurate details including any convictions
6. Has the organisation dealt with any incidents related to modern slavery or human trafficking in the past?
 - If yes, please provide accurate details with follow up actions.

Code of Conduct

Our code makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain. All staff will be trained in the principles of Modern Slavery and what to do if any instances are identified.

Whistle blowing Policy

Keir Training, encourages all its workers, service users, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, service users, customers or others who have concerns can use our confidential escalation process as detailed in the policy.

Recruitment Policy

We use only specified, reputable employment agencies, applying the principles of 'safer recruitment' to source labour and always verify the practices of any new agency before accepting workers from that agency.

Safeguarding and Prevent Policies

Our Safeguarding and Prevent policies set out the legislative requirements to provide a duty of care, promote positive well-being and provide a clear process for escalating concerns to protect the welfare of individuals.

Equality, Diversity and Inclusion Policy

Our Equality, Diversity and Inclusion policy is in place to ensure that we treat people fairly and with respect. Keir Training is committed to being an Employer of Choice and we will strive to create and implement our Equality, Diversity and Inclusion strategy.

Our supply chains and supplier adherence to our values

We expect the highest standards of conduct and probity throughout our supply chain, requiring all of our people to act with integrity and honesty. Our procurement processes include standard enquiries about modern slavery and trafficking, and we examine our supply chain using our dedicated quality assurance functions including audit, supply chain management, legal and risk.

Keir Training will continue to work with suppliers to ensure that they meet these standards and comply with the requirements of The Modern Slavery Act 2015.

What we will do

As part of our commitment to preventing modern slavery and human trafficking we will:

1. Introduce online training on the Modern Slavery Act as a mandatory element of induction and all Keir Training staff will have a requirement to complete training on the act, including how to identify and escalate any concerns.
2. Continue to review and develop the policies, processes and controls in place to support our commitment to mitigate risks of modern slavery across our organisation.
3. Keir Training will develop and update this statement to meet the requirements of the Modern Slavery Act on an annual basis.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, is approved by the Board of Governors and constitutes our slavery and human trafficking statement for the financial year starting 1st August 2022.

Signed:

Keziah Ampofo

Managing Director

August 2022