Anti-Slavery and Human Trafficking Policy

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Riverside Training maintains relationships with many different organisations in its supply chain, as well as employing large numbers of people. In the light of the law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine which existing measures are in place, and the further measures that may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chain.

Riverside Training expects all who have, or seek to have, a business relationship with Riverside Training to familiarise themselves with our anti-slavery policy and to act in accordance with its contents at all times.

Riverside Training is committed to opposing modern slavery in all its forms and preventing its occurrence by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is that of zero tolerance.

Aims of the Policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Riverside Training with the aim of preventing opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

Riverside Training has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

Scope of the Policy

Riverside Training is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners, and our contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Riverside Training expects our suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employee's obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- Engage with our suppliers both to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Responsibility for the Policy

Ultimate responsibility for the prevention of modern slavery rests with Riverside Training's Executive Board. The Executive Board of Directors have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on its contents and the issue of modern slavery.

Types of Concerns

'Whistleblowing' refers to the disclosure by individuals of suspected malpractice, illegal acts or omissions at work. Examples of the types of concerns that may be raised include:

- You suspect a person acting on behalf of Riverside Training is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Riverside Training or one of our supply chain partners who has invited you to participate in acts which could result in offences under the Act being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Riverside Training or one of our suppliers is preparing to commit, is committing or has committed an act in contravention of the Act.

The list is not exhaustive and simply representative of the types of concerns which may be raised.

Protection for those raising a concern

Riverside Training aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery, of whatever form, is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Riverside Training will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Raising a concern - Internal Reporting

As a first step employees should normally raise concerns with their immediate line manager, or contract manager where applicable. However, depending on the seriousness and sensitivity of the issue and the nature of the concern, employees may feel unable to raise the matter with their line manager and in this instance should approach the next level of management. The guiding rule is that employees should address their complaints to the level of management who they believe has no involvement in the matter.

If employees feel unable to raise the matter with their line manager, or their superior, the matter should be raised with one of the designated officers who have responsibility and training in dealing with whistleblowing concerns, namely: the Head of Risk and Assurance or the Head of Investigations using the dedicated and confidential email: safeguarding@riverside-training.co.uk A line manager in receipt of an allegation should refer it to the Head of Risk and Assurance or the Head of Investigations as outlined above.

External Reporting

This policy has been developed in order to provide employees with the guidance and reassurance they need to raise a concern internally. However, it is recognised that there may be circumstances where employees feel it necessary to raise their concerns outside the business and in these circumstances employees have a number of external avenues open to them.

Public Concern at Work is an independent charity and leading authority on public interest whistleblowing and can provide advice on how to raise a concern.

Public Concern at Work T: 0207 404 6609
E: whistle@pcaw.co.uk www.pcaw.co.uk

Employees can also raise their concerns with the proper authority (guidance is available from GOV.UK - Blowing the whistle: list of prescribed people and bodies).

Investigating Procedure

Action taken by Riverside Training will depend upon the nature of the concern. Disclosures will be assessed to:

- Determine whether a further investigation should be conducted
- Determine the form the investigation should take
- Appoint an investigating officer to undertake the investigation

If it is decided that an investigation is required, an investigating officer will be appointed who will aim to abide by the following steps:

- Obtain full details and clarifications of the concern
- Investigate the concern with third parties/witnesses where possible and obtain objective policies
- Secure all evidence in an admissible format
- The discloser will, as far as possible, be kept informed of progress and, if appropriate, the final outcome of the investigation
- Reporting of the findings will depend on the nature of the disclosure
- If appropriate, a copy of the outcomes will be reported to the Executive Board
- Confidential records will be maintained for monitoring purposes

Timescales

Investigations will be conducted as speedily as possible whilst having regard to the nature and complexity of the disclosure.

Outcomes

Depending on the findings of the investigation, outcomes may vary from no further action to sanctions against perpetrators.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Monitoring & Review

This policy is reviewed annually

Current Review Date	July 2026
Next Review Date	July 2027

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