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STATEMENT

MODERN SLAVERY & HUMAN TRAFFICKING

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1. PURPOSE & COMMITMENT

Crosby Training is committed to preventing slavery and human trafficking in its own operations and in the activities of its partner organisations. This Modern Slavery and Human Trafficking Statement sets out the actions Crosby Training is taking to understand and manage modern slavery risks connected with its business and its partnerships.

Crosby Training recognises its legal responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking. We are absolutely committed to ensuring that there is no slavery or human trafficking in our business activities or in that of our partner organisations.

This statement is current from the date of approval and will be reviewed and updated at least annually. It applies at all times, not only for a particular contract year.

2. ORGANISATIONAL STRUCTURE

Crosby Training is an independent training provider operating primarily across the Liverpool City Region. We work with a diverse range of partner organisations to support the employability and training needs of our learners.

Partner organisations may:

- provide work placements;
- deliver specialist training modules;
- support employability services and learner progression into employment.

Crosby Training currently has no overseas operations or overseas partners.



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3. LEGAL & FUNDING CONTEXT

This statement is made in accordance with the Modern Slavery Act 2015 and aligns with the safeguarding, ethical, and quality expectations of our main funders and commissioning bodies, including the Department for Work & Pensions, Adult Skills Fund, Riverside College and Jobcentre Plus.

Crosby Training is aware of its legal responsibilities under the Modern Slavery Act 2015 and ensures that partner organisations are aware of their obligations under the Act. Where applicable, Crosby Training seeks to ensure that partner agreements include expectations of compliance with the Modern Slavery Act 2015 and associated safeguarding and ethical standards.

4. RISK ASSESSMENT & RISK MANAGEMENT

Crosby Training recognises that modern slavery and human trafficking risks can arise in various contexts, including:

- work placements in sectors known to have higher risks, such as hospitality, construction, and related industries;
- specialist training delivery in sectors where labour exploitation risks are documented;
- recruitment or use of vulnerable workers, including those with limited English proficiency or limited understanding of the UK labour market.

Crosby Training has conducted a risk assessment of its operations and partnerships and identifies the following as key risk areas:

- learners entering employment or work placements in high-risk sectors.
- partner organisations operating in sectors with known labour exploitation risks.
- use of informal or unregulated arrangements for work-based learning.

To manage these risks, Crosby Training:

- selects partner organisations carefully, considering their known practices and sector risk;



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- requires partners to comply with relevant legislation and ethical standards;
- advises learners about their rights and about signs of exploitation and trafficking;
- provides safeguarding guidance that includes references to modern slavery and human trafficking;
- monitors complaints, concerns, and incidence data where relevant.

There have been no reported concerns of modern slavery or human trafficking raised by staff, learners, or partners to date.

5. POLICIES & PROCEDURES

Crosby Training has a number of policies that assist in preventing slavery and human trafficking in its operations and in the activities of its partner organisations, including:

5.1 Whistleblowing Policy

Crosby Training encourages all workers, learners, customers, and partner organisations to report any concerns related to the activities of the organisation or our partner organisations. The Whistleblowing Policy is designed to make it easy for individuals to raise concerns, including those relating to modern slavery, human trafficking, or exploitation, without fear of retaliation.

5.2 Safeguarding Policy

Modern slavery and human trafficking are treated as safeguarding concerns. Crosby Training provides advice and guidance to staff that includes references to modern slavery and trafficking. The legislation and its implications for practitioners and learners are clarified in the Safeguarding Policy and covered in:

- face-to-face staff training packages during staff induction;
- annual safeguarding training for key staff, which is updated each year.



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5.3 Recruitment and Selection

Crosby Training directly recruits its own staff and does not rely on agency labour. Where applicable, any recruitment agencies used are reputable, and their practices are verified before workers are accepted from them. Crosby Training ensures that approved recruitment arrangements conduct all relevant pre-recruitment checks and provide evidence that such checks have been conducted.

Learners are predominantly resident in the UK, including some who speak English as an additional language. They are not visitors or migrants entering the UK specifically for training.

6. TRAINING & AWARENESS

Crosby Training ensures that:

- All staff receive a briefing on modern slavery and human trafficking as part of safeguarding awareness.
- Key staff involved in training, safeguarding, and partnership working undertake annual modern slavery and safeguarding training, which is updated each year.
- Training is delivered via internal safeguarding training sessions and, where appropriate, through external training providers.

Crosby Training provides learners with information about their rights, the risks of exploitation in certain sectors, and how to report concerns.

7. PARTNER ORGANISATION ASSURANCE

Crosby Training:

- requires partner organisations to be aware of their obligations under the Modern Slavery Act 2015;
- expects partner organisations to have their own policies and procedures to prevent slavery and human trafficking;



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- removes any partner organisation that does not comply with the Modern Slavery Act 2015 or Crosby Training's own policies and procedures from its list of partner organisations;
- will not consider such organisations as future partners unless they can demonstrate that compliance requirements are met.

Where possible, Crosby Training seeks to ensure that partner agreements include expectations of compliance with the Modern Slavery Act 2015 and associated safeguarding standards.

8. PERFORMANCE INDICATORS

Crosby Training monitors progress in managing modern slavery risks as part of its wider quality and safeguarding processes. Progress and any improvements are considered as part of annual reports and Quality Improvement Plans.