

## Slavery and Human Trafficking Policy / Statement

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 came into effect on 29 October 2015 and requires commercial organisations in any sector with a turnover greater than £36m per annum to produce a 'Slavery and Human Trafficking Statement' for each financial year. A 'commercial organisation' is 'an organisation which supplies goods and services'. Turnover is calculated including subsidiaries, but subsidiaries with turnover below £36m per annum or which are not 'commercial organisations' do not need to publish a 'Slavery and Human Trafficking Statement' in their own name. If an organisation has taken no steps to ensure that modern slavery is not taking place in its business and supply chains, its Slavery and Human Trafficking Statement must state this.

If an organisation to which the requirement applies fails to produce a Slavery and Human Trafficking Statement for a particular financial year, the Secretary of State may bring proceedings in the High Court requiring the organisation to do so.

PMA is committed to the values and practises of safeguarding, including those associated with radicalisation and extremism. The welfare and safety of all learners and staff is paramount. We expect all those involved with PMA to share this commitment.

This statement sets out the actions for PMA; to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. As part of Further Education Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. PMA is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of PMA, a national training provider operating across England, providing education and training. PMA has a diverse supply chain, covering staffing resources and operational activities, including but not limited to, estates management, cleaning and transport. PMA is aware of its responsibility under the Act and is developing its framework to ensure its supply chain complies with the Act, and this will include policies, risk assessment, due diligence and training requirements.

### **Relevant policies**

PMA has a number of policies and procedures that assist in preventing slavery and human trafficking in its operations, including:

### **Public Interest Disclosure procedure (Whistleblowing procedure)**

PMA encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

### **Code of conduct**

PMA's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.

### **Supplier terms & conditions**

PMA is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its Terms & Conditions will be undertaken in 2020/2021 to ensure that suppliers are aware of their obligations under the Act and comply where necessary.

### **Staffing and recruitment appointment policy and guidelines**

PMA uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. PMA also aims to use best practice procedures when sourcing own recruitment.

### **Due diligence**

PMA undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations. Due diligence includes specialist checks on the supplier/subcontractor/associate application form so that suppliers can provide evidence that the organisation complies with the Act, and thereby PMA can seek assurance.

Further work will also include an analysis of the current suppliers who meet the turnover criteria, and for these organisations, a system will be put in place to gain assurance that the organisation complies with the Act or is working toward compliance, and thereby PMA can seek assurance. Additionally, through PMA's procurement activities, future tender documents will include a supplier suitability assessment questionnaire to seek assurance before entering into new contracts.

### **Training**

PMA will ensure that key staff will undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

### **Awareness raising programme**

PMA will continue to offer support and guidance through the below when a concern is raised:

- How employers can identify and prevent slavery and human trafficking
- What employees can do to flag up potential slavery or human trafficking issues
- What external help is available, for example, through the Modern Slavery Helpline.

This statement has been approved by the senior management of PMA and will be reviewed and updated annually as part of the review of the financial statements.

### **Statement Approval**

This statement is approved by the Directors of PMA

Signed by

**Austin Ambrose**  
Client Services Director

**Ian Jones**  
Operations Director

**Main Contacts:**

Name	Job Title	Address	Mobile phone
Ian Jones	Operations Director	<a href="mailto:ian@practicemanagersuk.org">ian@practicemanagersuk.org</a>	07880 788 985
Austin Ambrose	Client Services Director	<a href="mailto:austin@practicemanagersuk.org">austin@practicemanagersuk.org</a>	07726 921 685
Lisa Lindgren	Head of Education	<a href="mailto:lisa@practicemanagersuk.org">lisa@practicemanagersuk.org</a>	07751 091 395

**Should you have any concerns around Safeguarding please email:**

**PMA DSL, Lisa Lindgren at:** [safeguarding@practicemanagersuk.org](mailto:safeguarding@practicemanagersuk.org)

**Please be assured your email will be treated in the strictest confidence and that you will receive a direct reply from Lisa within 24 hours.**

**Revisions control:**

Date	Summary of changes made	Changes made by (Name)	Version No.
Sept 2020	Review and full replacement of Policy / Statement	Lisa Lindgren	V3.0

**Next Review Due:** August 2021