

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1 AUGUST 2025

Strive Training - Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps Strive Training has taken to ensure that modern slavery and human trafficking are not taking place within our organisation or our supply chains.

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Strive Training recognise that, as a commercial organisation, it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms. We are committed to preventing slavery and human trafficking in our corporate activities and to ensuring through a process of vigorous investigation that our supply chains are, to our knowledge, free from slavery and human trafficking.

We have always taken ethical trading seriously, having adhered to stringent ethical and environmental supplier procedures since we first began trading in 2010. These procedures have ensured our supply chain and products are safe to use, fit for purpose and manufactured in ethically maintained and environmentally responsible conditions.

Organisation Structure, Business, and Supply Chains

Strive Training is an independent training provider operating across London and nationwide (UK). We deliver adult education and employability-focused qualifications, including AEB, Free Courses for Jobs, and other ESFA- and GLA-funded programmes. Our core delivery includes Level 1–3 vocational qualifications, digital skills, employability courses, and community-based learning for unemployed and low-waged adults.

We work with a range of stakeholders, including subcontractors, referral partners, venue providers, awarding organisations, and third-party suppliers (e.g. IT support, curriculum resources etc.). Our supply chains are predominantly UK-based and include both educational and operational services.

Policies in Relation to Slavery and Human Trafficking

Strive Training has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our operations and relationships, and we expect the same high standards from our suppliers and delivery partners.

Our key policies relevant to this commitment include:

- Safeguarding Policy
- Prevent Policy
- Whistleblowing Policy
- Sustainability Policy
- Staff Code of Conduct

These policies are reviewed annually to ensure they remain fit for purpose and reflect current legislation and best practice.

Due Diligence Processes

We carry out appropriate due diligence on new and existing suppliers and delivery partners. This includes:

- Requiring declarations of compliance with the Modern Slavery Act as part of our contracting process.
- Conducting risk assessments and reviewing accreditation (e.g. Matrix, Direct Claims Status, etc.)
- Performing annual audits for subcontractors and critical suppliers.
- Maintaining a whistleblowing mechanism that allows concerns to be raised in confidence.

Risk Assessment and Management

While the majority of our supply chain is based in the UK and operates in low-risk sectors, we acknowledge that risk can still exist, particularly where services involve outsourced labour (e.g. technology facilities).

To mitigate risks, we:

- Prioritise ethical procurement and vetting of contractors.
- Include modern slavery risk as part of our annual Quality Assurance reviews.
- Assess suppliers based on sector risk, geography, and service type.

Measuring Effectiveness

To monitor our progress and effectiveness, we use the following indicators:

- 100% of new suppliers and delivery partners undergo due diligence screening.
- Annual reviews of all supply chain contracts include checks for modern slavery compliance.
- No whistleblowing reports or safeguarding referrals related to modern slavery during the last reporting year.
- All staff complete mandatory safeguarding training, which includes reference to modern slavery.

Performance against these indicators is reported to our Senior Leadership Team and used to inform continuous improvement.

Staff Training and Capacity Building

We recognise that raising awareness among our staff is essential in identifying and preventing modern slavery. All staff receive:

- **Mandatory safeguarding training**, including modules on modern slavery, trafficking, and exploitation.
- **Annual CPD sessions** focused on vulnerable learners and contextual safeguarding.
- Access to guidance on how to identify and report concerns.

Managers, safeguarding leads, and procurement staff receive additional, targeted training to equip them with the tools to monitor risk and uphold our standards.

Approval and Review

This statement has been approved by the Board of Directors of Strive Training and will be reviewed and updated annually.