

# Modern Slavery – Our Policy



## Modern Slavery Policy

Version: 1.2; effective from March 2025

Policy Summary: This policy set out the robust measures to prevent, detect, and address modern slavery issues. It recognises Cheynes Training's responsibility to act with integrity in all our dealings and to ensure that our business operations and supply chains are free from modern slavery and human trafficking. This policy applies to all employees, key consultants, suppliers and other persons working closely with Cheynes Training.

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### 1 Introduction

Modern slavery is a grave violation of human rights that encompasses slavery, forced and compulsory labour, and human trafficking. This policy sets out our approach and commitments to combating modern slavery in all its forms as well as setting out the responsibilities of Cheynes Training senior managers, employees, key consultants, suppliers, and anyone else working closely with Cheynes Training.

### 2 Our Approach and Commitment

Cheyne Training is committed to preventing and helping to eradicate modern slavery and human trafficking. We recognise that modern slavery is a grave violation of human rights and a serious crime that affects millions of people worldwide. This policy outlines our zero-tolerance approach to any form of modern slavery within our operations and supply chains.

As an organisation, we are dedicated to identifying, assessing, and mitigating the risks of modern slavery in our business activities.

We acknowledge our responsibility under the Modern Slavery Act 2015 and we are committed to transparency in our approach to tackling modern slavery.

### 3 Definitions

Modern slavery is the term used within the UK to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking and the associated criminal offences are defined within the Modern Slavery Act 2015.

Human trafficking is where a person arranges, or facilitates, the travel of another person with a view to that person being exploited.

### 4 Policy Aims

By implementing this policy, we aim to:

- Raise awareness about modern slavery among our team, key consultants, and other stakeholders.
- Establish due diligence processes to identify and address risks in our operations and supply chains.
- Implement robust, transparent and proportionate governance processes
- Provide support and protection to any individuals identified as victims of modern slavery.
- Ensure compliance with all applicable laws and regulations related to modern slavery and human trafficking.
- Report instances or concerns of modern slavery to the appropriate body.

## 5 Identifying Modern Slavery

There is no typical victim of modern slavery, and some victims do not understand they have been exploited or that they are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery, human trafficking, or forced labour:

- The person is not in possession of their own passport, identification or travel documents.
- The person's wages are being paid into a bank account in another name, which may be an indicator of debt bondage or withholding of wages.
- The person is acting as though they are being instructed or coached by someone else.
- The person is working excessive overtime.
- The person allows others to speak for them when spoken to directly.
- The person is dropped off and collected from work.
- The person is withdrawn or appears frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside of their immediate environment.
- There are signs of abusive working or living conditions.

The above list is not exhaustive. A person may display several of the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

## 6. Organisational structure and supply chains

Cheyne Training is one of the UK's largest and most successful specialist hair and barbering apprenticeship providers. For more information on our business structure, go to our website [www.cheynestraining.co.uk](http://www.cheynestraining.co.uk)

The Cheynes Training supply chain includes a network of Cheynes Training Academies which comprise a training facility and qualified Tutors/Assessors. We also work with carefully selected hair salons/barbers who employ the apprentices, as well as the End Point Assessment Organisation (EPAO) and awarding body, City and Guilds

## 7. Policies

Cheyne Training has the following relevant policies to ensure we conduct all business in an ethical manner and are committed to being a transparent organisation:

- **Modern Slavery policy**, detailing our stance on modern slavery and human trafficking, who has responsibility over the policy and how our team can identify and report suspicions.
- **Public Disclosure Policy (Whistleblowing)**, to ensure our team members feel comfortable raising concerns without fear of repercussion.
- **Recruitment policy**, containing our strict recruitment policy that checks the eligibility of workers for UK employment.
- **Code of Conduct**, detailing the standards we expect our organisation, team members and suppliers to meet.

## 8. Risk in the Context of Cheynes Training

As a provider of hairdressing and barbering apprenticeships we generally face a low risk of modern slavery occurring within our direct operations. We operate in a low-risk environment for modern slavery due to our primary activities being education and skills development. We maintain robust recruitment processes to ensure all Cheynes Training employees have the right to work and are not victims of trafficking or forced labour. We also complete stringent eligibility checks when processing apprenticeship applications, in line with the apprenticeship funding rules, to ensure that apprentices have the right to work and are not victims of trafficking or forced labour.

The main risk area for Cheynes Training is in our supply chains, which are generally established companies who are based in the United Kingdom; however, in a limited number of cases, we procure goods and services from large online suppliers such as Amazon. We will however undertake due diligence to ensure that our key consultants, suppliers, and anyone else working closely with Cheynes Training adhere to ethical practices and are free from modern slavery.

While the direct risk of modern slavery within our sector is generally low, we take our responsibilities for ensuring our operations and supply chains are free from such practices very seriously.

## 9 Responsibilities and Accountabilities

We expect all employees, key consultants, suppliers, and anyone else working closely with Cheynes Training to adhere to this policy and to report any suspicions or concerns related to modern slavery through the appropriate channels.

We expect all Cheynes Training team members, especially, to adopt the following responsibilities:

- Awareness and vigilance: Team members are expected to be aware of the signs of modern slavery and human trafficking, and to be vigilant in their day-to-day roles.
- Reporting suspicions: Team members are required to report any concerns or suspicions of modern slavery. This can be done by contacting our dedicated Safeguarding, Prevent and Reasonable Adjustments Lead, Melissa Birch (24/7 contact number 07816 335 015 or email [melissa@cheynestraining.com](mailto:melissa@cheynestraining.com)) or by following the procedures outlined in the Cheynes Training Public Disclosure Policy (Whistleblowing).
- Completing training: Cheynes Training team members are responsible for completing any mandatory e-learning courses, including those on safeguarding, which also covers modern slavery.
- Familiarising themselves with policies: team members should familiarise themselves with our Safeguarding Policy and Modern Slavery Policy.
- Avoiding risky activities: team members are required to avoid any activity that might lead to or suggest a breach of the modern slavery policy.
- Assessing risks: When procuring goods or services, team members should assess any risks related to modern slavery and human trafficking.

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- Upholding company values: All staff are required to safeguard and uphold the company's core values by operating in an ethical, professional, and lawful manner.
- Adhering to the policy: Team members are expected to understand and adhere to the Cheynes Training Modern Slavery Policy.
- Taking proactive steps: Team members are expected to be proactive and take necessary and appropriate steps to ensure that modern slavery does not occur in their work activities.

Our key consultants and suppliers also have important responsibilities when it comes to modern slavery policies:

- Comply with applicable laws and regulations: key consultants and suppliers must adhere to all relevant human rights and employment laws.
- Implement and enforce anti-slavery policies: key consultants and suppliers should have their own modern slavery policies in place that prohibit forced labour, human trafficking, and other forms of exploitation.
- Report concerns and cooperate with investigations: key consultants and suppliers must report any suspicions of modern slavery to relevant authorities and fully cooperate with any investigation.
- Take corrective action: If modern slavery is identified in their supply chains, key consultants and suppliers must take immediate action to address the issue and support victims.
- Maintain transparency: key consultants and suppliers should be transparent about their anti-slavery efforts and provide information to clients when requested.

## **10 Awareness and Training**

We will raise awareness of this policy (and the Act) by notifying Cheynes Training team members and key consultants, suppliers and other organisations with which we regularly engage.

The policy will be published on the Cheynes Training website and available on request via [enquiries@cheynestraining.com](mailto:enquiries@cheynestraining.com)

Training for the Cheynes Training team will include High Speed Training on Human Trafficking and Modern Slavery which will enable team members to identify risks of modern slavery and ensure that any cases are handled correctly.

We will maintain records of all Cheynes Training team members who have completed modern slavery training.

Updates and briefings are also provided via our monthly newsletter, Education and Training Briefing (ETB).

## **11 Assurance and Transparency**

Cheyne Training are committed to implementing systems and controls aimed at ensuring that modern slavery will not occur within our operations. As part of this commitment, we shall make this policy document easily accessible for Cheynes Training team members and stakeholders, and demonstrate our commitment to ongoing improvement by regularly reviewing and updating our Modern Slavery policy.

## **12 Non-Compliance, Reporting and Victim Support**

If any Cheynes Training team member is discovered to have breached this policy, appropriate disciplinary action will be taken.

If any key contractor or supplier is found to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remedied, to the termination of agreements.

Individuals who have reasonable suspicion or evidence of modern slavery or non-compliance with the Modern Slavery Act must immediately report their concerns to Cheynes Training Safeguarding, Prevent and Reasonable Adjustments Lead, Melissa Birch (24/7 contact number 07816 335 015 or email [melissa@cheynestraining.com](mailto:melissa@cheynestraining.com))

If the incident has a high level of threat or risk of harm, individuals must refer the case to the emergency services by dialling 999.

## **13 Review and Monitoring**

We will review this policy on an annual basis.

Last review: February 2025

Next review: February 2026

Melanie Mitchell, Managing Director, 28 February 2025