

MODERN SLAVERY STATEMENT

2024-2025



This statement applies to Thrive Training, referred to herein as Thrive. Here are the steps the Thrive has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains. This statement is published in line with section 54(1) of the Modern Slavery Act 2015. The information included in the statement refers to the financial year ending October 2023.

About Thrive

Thrive is an independent UK education provider with one centralised office at the *Training Centre: Suite 2, The old Foundry, Bath Street, Walsall, WS1 3BZ*. The main activity carried out by Thrive is the delivery of further and higher education courses to adult students. The courses offered include the use of any specialised equipment which is provided through kits given to students. The majority of delivery is online, although some face-to-face delivery is also offered. Demand throughout the year varies very little, although the courses are designed to follow the cohort and assessment periods of the courses' accrediting organisations. Operation and management of Thrive is carried out in Walsall, United Kingdom.

Definitions

Thrive considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through coercion, mental or physical abuse or the threat of such abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.
- Other forms of criminal exploitation where the victim is expected to perform unlawful actions.

Our Commitment

Thrive acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Thrive understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Thrive's turnover for the period of November 1st 2022 to 31st October 2023 is £851,829. As Thrive does not have a turnover of above £36 million, it is not required to publish an annual modern slavery statement. However, as a conscientious company, Thrive is committed to the abolition of modern slavery and human trafficking. Thrive recognises that the courses offered are in industries in which modern slavery is known to be present. Therefore, Thrive takes a step further than needed to prevent modern slavery in its business and its supply chains and ensure that our staff and students are fully aware of how to identify, prevent and report instances of modern slavery.

Thrive does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to Thrive in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Thrive strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

As an equal opportunity employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers, mainly through UK government frameworks.

Potential Exposure

Thrive considers its main exposure to the risk of slavery and human trafficking to exist within the activities of the students who are enrolled on programmes of study with Thrive. In general, Thrive considers its exposure to slavery/human trafficking to be extremely low, despite the courses offered being related to industries where modern slavery has been known to exist. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it. Our students are from within the UK and we have robust measures to safeguard our students against the threat of modern slavery, and strive to increase awareness of this amongst the student body.

Actions

Thrive carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. Thrive has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, Thrive has taken the following steps to ensure that modern slavery is not taking place:

- Review suppliers on a regular basis, contacting them in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Undertake impact assessments of its services upon potential instances of slavery.
- Follow action plans to address risk to modern slavery.
- Continue to ensure clear actions are taken to embed a zero-tolerance policy towards modern slavery.
- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensuring staff involved in procurement activity are aware of and follow [modern slavery procurement guidance on GOV.UK](#)
- Ensuring that consideration of the modern slavery risks and prevention are added to Thrive's policy review process as an employer and procurer of goods and services.
- Making sure Thrive's procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

Key Performance Indicators

Thrive has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in Thrive or its supply chains.

- Staff are aware of Modern Slavery and the actions to take should they suspect it to be occurring.
- There is a low incidence of reporting of Modern Slavery – where this intersects with a high level of awareness.
- Any suspected incidents are reported effectively with swift and proportionate action being taken.

Policies

Thrive has a number of policies which further define its stance on modern slavery. The following policies are available to all staff and students through the Thrive website and intranet:

- Anti-harassment and Anti-bullying policy
- Equality, Diversity and inclusion policy
- Ethics policy
- Safer recruitment policy
- Staff code of conduct
- Student code of conduct
- Whistleblowing policy

Training

Thrive provides regular training to staff to effectively implement its stance on modern slavery. Written guidance on modern slavery with the facilities to conduct further reading into the any changes in the Modern Slavery Act. It also seeks to embed awareness of Modern Slavery within the courses that it delivers to students.

Slavery Compliance Personnel

The Director has ultimate responsibility for ensuring that Thrive as an organisation is free from links to Modern Slavery. However, the Designated Safeguarding Lead (or in their absence, the nominated deputy as detailed in the safeguarding process) will be the point of contact for all concerns regarding modern slavery, and who will then undertake relevant action with regard to Thrive obligations in this regard. Thrive regards all staff to share responsibility to effectively safeguard their working practices against the potential exploitation of Modern Slavery and to be alert to this in their interactions with students. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed and updated for each financial year.

Date of approval: 11th February 2025

Signed: 

Date: 12th February 2025.