



Modern Slavery and Human Trafficking Policy Statement

Policy Reference: DS GOV 001

Version: 1.0

Policy Owner: Company Director

Approval Date: June 2025

Review Date: Yearly

Applies To: All Directors, Employees, Self-employed Trainers, Contractors, Suppliers and Associated Persons

1. Policy Statement and Commitment

At Distinction Solutions, we are committed to operating our business ethically, responsibly and transparently. We recognise our responsibility to respect human rights, uphold fair working practices and take proportionate steps to prevent modern slavery, human trafficking, forced labour and exploitation within our business operations and supply chains.

We operate with a zero tolerance approach towards modern slavery and human trafficking in all their forms.

We recognise that modern slavery can occur in any industry, regardless of the size or nature of an organisation. We therefore believe that every business has a responsibility to identify potential risks, promote ethical employment practices and ensure that individuals working directly or indirectly on its behalf are treated with dignity, fairness and respect.

Although organisations with an annual turnover of £36 million or more are subject to specific reporting obligations under Section 54 of the Modern Slavery Act 2015, we recognise the importance of voluntarily demonstrating our commitment to responsible business practices.

This policy establishes our framework for identifying, preventing, managing and responding to modern slavery risks.

Our objectives are to:

- Prevent forced labour, human trafficking, servitude and exploitation.
- Promote ethical recruitment and fair working arrangements.
- Ensure appropriate due diligence across our workforce, contractors and supply chains.
- Maintain transparent and accountable business relationships.
- Provide clear procedures for identifying and reporting concerns.
- Take appropriate corrective action where potential exploitation is identified.
- Review and improve our arrangements as the organisation develops.

2. Legislative and Regulatory Framework

Our policy is informed by relevant UK legislation and recognised principles of ethical employment and responsible procurement.

This includes:

- Modern Slavery Act 2015.
- Human Rights Act 1998.
- Employment Rights Act 1996 and subsequent applicable amendments.
- National Minimum Wage Act 1998.
- Equality Act 2010.
- Immigration, Asylum and Nationality Act 2006.
- Bribery Act 2010.
- Public Interest Disclosure Act 1998.
- Data Protection Act 2018 and UK GDPR.

We recognise that modern slavery offences may involve the exploitation of individuals through coercion, threats, restricted freedom, debt bondage, deceptive recruitment, withholding of wages or other forms of control.

We do not knowingly engage with organisations or individuals involved in such practices.

3. Organisational Structure, Business Operations and Supply Chain

Requirement A – Organisational Structure, Business and Supply Chains

Distinction Solutions is a UK based training and education provider specialising in mandatory, statutory, specialist and clinical training across the health and social care and education sectors.

Our services include:

- Mandatory and statutory healthcare training.
- Prevention and Management of Violence and Aggression (PMVA).
- Conflict Resolution, De-escalation and Breakaway Training.
- Positive Behaviour Support and Trauma Informed Care.
- Safeguarding Adults and Children.
- Specialist clinical procedures and healthcare training.
- Moving and Handling, Life Support and First Aid.
- Vocational education and professional qualifications.
- Online learning, face to face training and blended learning.

We work with healthcare organisations, universities, education providers, care agencies, private businesses and public sector organisations.

3.1 Workforce and Contractual Arrangements

Our training model incorporates a network of self-employed and contracted trainers with appropriate subject knowledge, qualifications, experience and professional competencies. Our responsibilities include ensuring that individuals engaged to deliver training meet the professional and contractual standards required for their duties.

We recognise that self-employment does not eliminate the potential for exploitation or inappropriate working arrangements.

We therefore apply proportionate checks to our contractor approval and ongoing engagement processes.

3.2 Supply Chain Relationships

Our supply chain may include:

- Self-employed trainers and specialist clinical educators.
- Training equipment and educational resource suppliers.
- Qualification awarding organisations.
- Information technology and learning management system providers.
- Training venues and associated facilities.
- Professional consultants and external service providers.
- Administrative and business support services.

We recognise that some supply chain activities may present different levels of risk and that our due diligence arrangements should reflect the nature of the goods or services being supplied.

4. Policies and Procedures Relating to Modern Slavery

Requirement B – Policies in Relation to Slavery and Human Trafficking

Our Modern Slavery and Human Trafficking Policy operate alongside our wider governance arrangements. Relevant organisational policies and procedures include:

- Safeguarding Policy.
- Quality Assurance Policy.
- Recruitment and Contractor Approval Procedures.
- Health and Safety Policy.
- Data Protection and Confidentiality Policy.
- Equality, Diversity and Inclusion Policy.
- Business Continuity Arrangements.
- Risk Assessment and Safe Working Procedures.
- Complaints and Incident Reporting Procedures.

These arrangements collectively support ethical conduct, accountability, safe working practices and appropriate management oversight.

4.1 Ethical Working Practices

We expect everyone working with or on behalf of Distinction Solutions to operate in accordance with lawful and ethical working practices.

Our standards prohibit:

- Forced, compulsory or bonded labour.
- Human trafficking or exploitation.
- Threats, coercion, intimidation or abuse.
- Unlawful withholding of wages or payments.
- Retention of passports or identity documents as a means of control.
- Recruitment practices involving deceptive terms or inappropriate recruitment fees.
- Discrimination, harassment or victimisation.
- Employment of individuals without the legal right to undertake the relevant work.

We expect suppliers and contractors to uphold equivalent principles.

4.2 Accountability

- Overall responsibility for this policy rests with the Company Director – Steven Ince.
- Operational responsibility includes ensuring that concerns are investigated appropriately, relevant processes are reviewed and identified risks are addressed.
- All individuals working with us have a responsibility to report genuine concerns about potential exploitation.

5. Due Diligence Processes

Requirement C – Due Diligence in Business Operations and Supply Chains

We recognise that effective prevention requires appropriate checks before and during business relationships.

Our due diligence focuses on recruitment, contractor approval, supplier selection, contractual arrangements and ongoing monitoring.

5.1 Trainer and Contractor Approval

Before engaging self-employed trainers and specialist contractors, our approval process requires proportionate checks, including:

- Verification of identity and relevant right to work requirements.
- Review of professional qualifications and experience.
- Appropriate references.
- Confirmation of relevant professional insurance.
- Review of any required professional registrations or certifications.
- Confirmation of contractual terms, responsibilities and payment arrangements.
- Consideration of safeguarding and other role specific requirements.

We expect contractors to enter working arrangements voluntarily and without coercion. Contractor documentation is managed through our secure HR and contractor records, with access restricted to authorised personnel.

5.2 Supplier Approval and Monitoring

When selecting suppliers, we assess relevant factors such as business legitimacy, suitability, reliability and professional standards.

Where appropriate and proportionate to the supplier's risk profile, additional checks may include:

- Verification of company registration and trading details.
- Review of the supplier's modern slavery statement or ethical trading commitments.
- Assessment of recruitment and labour practices.
- Confirmation of subcontracting arrangements.
- Review of previous concerns or adverse information.
- Evaluation of identified risks and required corrective measures.

We reserve the right to request additional assurances, documentation or explanations where potential risks are identified.

5.3 Contractual Safeguards

We aim to maintain clear contractual relationships with suppliers and contractors.

Our contractual standards require lawful working arrangements, ethical conduct, professional accountability and cooperation with reasonable compliance enquiries.

Where modern slavery concerns arise, we may suspend engagement, require remedial action or terminate contractual relationships where legally and contractually appropriate.

Any action will take account of the safety and welfare of affected individuals.

6. Risk Assessment and Risk Management

Requirement D – Areas of Risk and Steps Taken to Assess and Manage Them

We recognise that potential modern slavery risks may arise in both our direct operations and external supply chains.

Risk assessments should consider the nature of the services provided, employment arrangements, subcontracting, geographical location, transparency of recruitment and any indicators of exploitation.

6.1 Identified Risk Areas

Self-employed Trainers and Contractors

Potential risks include inappropriate recruitment practices, unclear contractual relationships, coercive working arrangements or exploitation by third party intermediaries.

External Suppliers and Subcontractors

Potential risks may arise where goods or services are provided through complex supply chains, particularly where lower skilled or temporary labour is involved.

We apply risk based supplier due diligence and seek additional assurances where necessary.

Training Equipment and Educational Resources

Certain equipment and resources may originate from international manufacturing and distribution chains where working conditions are less visible.

We seek to use reputable suppliers and consider available ethical sourcing information when procurement risks warrant further investigation.

Digital and Administrative Services

Third party technology, administration and support providers may use subcontracted workforces.

We consider the transparency, legitimacy and relevant contractual safeguards of suppliers where appropriate.

6.2 Risk Assessment Methodology

Our assessment considers:

- The likelihood of exploitation occurring.
- The potential severity of harm to affected individuals.
- The transparency and complexity of the working arrangements.
- The extent of subcontracting or agency involvement.
- The strength of existing safeguards and available evidence.
- Whether further action, monitoring or escalation is required.

Where significant risks are identified, we will document the concern, establish appropriate corrective actions and review their effectiveness.

Modern slavery risks must not be treated solely as commercial or reputational issues. The welfare and safety of potentially affected individuals will remain a priority.

7. Reporting Concerns and Whistleblowing

We encourage individuals to raise concerns where they suspect modern slavery, human trafficking or exploitation.

Concerns may include:

- An individual appearing unable to leave their employment freely.
- Signs of intimidation, threats or coercion.
- Evidence of withheld wages or unlawful deductions.
- A third party controlling an individual's identity documents or finances.
- Unusual restrictions on freedom of movement or communication.
- Indications of debt bondage or deceptive recruitment.
- Unsafe or exploitative working and living conditions.

Concerns should be reported directly to the Company Director or through our designated business contact:

Distinction Solutions

Email: info@distinction.solutions

Telephone: 0204 539 4600

We will treat reports seriously, sensitively and confidentially, subject to safeguarding responsibilities and lawful disclosure requirements.

We do not tolerate retaliation against individuals who raise genuine concerns in good faith.

7.1 Responding to Concerns

Where a concern is raised, we will:

- Assess any immediate risk to the individual's safety.
- Record relevant information securely and accurately.
- Avoid actions that may expose the individual to further danger.
- Escalate the concern to appropriate safeguarding or statutory authorities.
- Cooperate with lawful investigations.
- Consider appropriate contractual or operational safeguards.
- Review whether additional preventative measures are required.

Where an individual is in immediate danger, emergency services should be contacted on 999.

Suspected modern slavery may also be reported to the police or through the UK Modern Slavery & Exploitation Helpline on 08000 121 700.

We will not undertake investigations that should properly be conducted by the police or other competent authorities.

8. Measuring Effectiveness and Performance

Requirement E – Effectiveness and Performance Indicators

We recognise that publishing a policy alone does not demonstrate its effectiveness.

We are committed to establishing proportionate monitoring arrangements that allow us to evaluate whether our preventative measures are being implemented and whether improvements are required.

Our performance indicators will include:

Performance Indicator	Our Target
New trainer and contractor approval checks	100% completed before engagement
Modern slavery concerns reported	100% recorded and assessed
High risk supplier assessments	100% reviewed before approval or continued engagement
Confirmed corrective actions	100% assigned an owner and reviewed
Policy review	At least annually
Relevant governance and awareness training	100% of designated personnel within agreed timescales

These indicators represent our management commitments and will be monitored through appropriate records, reviews and internal reporting.

We will assess performance against these measures and introduce improvements where monitoring identifies weaknesses.

We recognise that a low number of reports does not necessarily demonstrate an absence of exploitation. Our evaluation will also consider the effectiveness of reporting arrangements, the quality of due diligence and the identification of potential risks.

9. Training, Awareness and Capacity Building

Requirement F – Training and Capacity Building

We recognise that preventing modern slavery requires awareness, understanding and the ability to identify potential signs of exploitation.

Our approach to awareness and capacity building will be proportionate to individual roles and responsibilities.

9.1 Management and Administrative Personnel

Personnel involved in recruitment, contractor approval, procurement, safeguarding and contract management will receive appropriate information and guidance relating to:

- Modern slavery and human trafficking.
- Identifying potential indicators of exploitation.
- Ethical recruitment and working arrangements.
- Supplier and contractor due diligence.
- Reporting and escalation procedures.
- Safeguarding responsibilities.
- Appropriate record keeping.

9.2 Trainers and Contractors

We will communicate our expectations to trainers and contractors through relevant onboarding information, contractual arrangements, policy access and professional communications.

Individuals are expected to understand their responsibility to report safeguarding concerns, exploitation or unethical conduct encountered during their work.

9.3 Continuing Development

Training and awareness arrangements will be reviewed when legislation, recognised guidance, operational risks or our business activities change.

Records of completed training and relevant policy acknowledgements will be maintained where applicable.

10. Procurement and Responsible Supply Chain Management

We recognise that ethical procurement contributes to responsible business operations and the protection of individuals who may be vulnerable to exploitation.

We seek to establish relationships with reputable suppliers who share our expectations regarding lawful and ethical conduct.

When engaging suppliers, we will consider the nature of the contract, potential labour risks, available assurance information and the proportionality of further checks.

We expect our suppliers to cooperate with reasonable enquiries concerning their working arrangements and supply chains.

Where suppliers fail to demonstrate appropriate standards, we will consider the circumstances, the welfare of potentially affected individuals and the need for corrective action.

We will not knowingly support or benefit from forced labour, human trafficking or other forms of modern slavery.

11. Information Governance and Record Keeping

We recognise the importance of maintaining appropriate records to demonstrate the implementation of this policy.

Relevant documentation may include:

- Contractor approval and due diligence records.
- Supplier risk assessments.
- Training and awareness records.
- Incident and concern reports.
- Corrective action plans.
- Policy reviews and management decisions.

Records will be retained securely, with appropriate access restrictions, in accordance with relevant data protection legislation and our organisational retention arrangements.

Personal information relating to potential victims, witnesses or individuals reporting concerns will be handled sensitively and only disclosed where lawful and necessary.

12. Continuous Improvement

At Distinction Solutions, we believe responsible business management requires ongoing review rather than a one off commitment.

We will review our modern slavery arrangements in response to:

- Changes in legislation or official guidance.
- New contractual or procurement requirements.
- Identified safeguarding or supply chain risks.
- Significant changes to our workforce or operational structure.
- Concerns or incidents requiring investigation.
- Findings from quality assurance and management reviews.

Where improvements are identified, responsibilities and appropriate timescales will be established to support implementation.

13. Policy Monitoring and Review

This policy will be reviewed at least annually by the Company Director, or sooner where significant legislative, operational or contractual changes arise.

Our review will consider the effectiveness of our due diligence arrangements, the adequacy of our reporting procedures, identified risks and the progress of any corrective actions.

Where relevant, the findings will inform updates to our wider governance and supply chain management procedures.

14.Organisational Declaration

We are committed to maintaining an ethical, responsible and transparent business that respects human rights and promotes fair treatment across our operations.

We recognise that our responsibilities extend beyond our direct workforce to the contractors, suppliers and associated organisations involved in delivering our services.

Through our policies, due diligence arrangements, risk assessments, awareness activities and continual improvement processes, we aim to reduce the risk of modern slavery and human trafficking within our organisation and supply chains.

We will continue to review our practices and take appropriate action where risks or concerns are identified.

Document Approval

Organisation: Distinction Solutions

Approved By: Steven Ince – Company Director

Signature:



Date: 10th June 2005