

ETF ANTI-SLAVERY STATEMENT

Introduction

The Education and Training Foundation (ETF) is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our ongoing commitment to act ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our corporate and charitable activities, which also extends to our supply chains. We continually strive to work with our external Suppliers who share the same values.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery Statement for the financial year 6 April 2020 to 5 April 2021. It is the first year that we have issued an anti-slavery statement, given that it is the first year our business has had a turnover exceeding £36m.

Organisational structure and supply chains

This statement covers the activities of the ETF and ETF Services Limited.

The ETF was established in August 2013 as the government-backed, sector-led workforce development body for the FE and Training sector. We deliver professional learning and development for teachers, trainers and leaders. We are the guardian of the Professional Standards for the sector and have a professional membership body: the Society for Education and Training (SET). We are a registered charity and received charitable status in September 2013. Our established charitable objectives place improving the quality of learning through empowering the professionals of the sector at the core of our operations.

The ETF currently operates only in England. The following is the process by which we have assessed whether or not particular activities were high risk in relation to slavery or human trafficking:

High-risk activities

Any activities that are considered to be at high risk of slavery or human trafficking will be identified through our due diligence processes and reported against within our end-of-year statement, which will be published in March 2021.

Due diligence

The ETF will undertake due diligence when considering taking on new Suppliers and will regularly review its existing Suppliers. These actions will include:

- Evaluating the modern slavery and human trafficking risks of each new Supplier as part of our open tendering process. As part of their tender response, and to ensure

that we monitor compliance and mitigate risk in all parts of our supply chain, including subcontractors, Suppliers are required to confirm that they:

- Commit to our policies and procedures.
- Do not engage in any activities that constitute human rights abuses (including slavery and child labour) or any other unethical working practices.
- Take proactive steps to safeguard against unethical conduct in their own procurement and supply management
- Reviewing on a regular basis, all aspects of the supply chain from initial inception and throughout the life of the contract.;
- Creating an annual risk profile for each Supplier.
- Invoking sanctions against Suppliers that seriously violate our Supplier Code of Conduct, including the termination of the business relationship.

Relevant policies

The ETF operates the following policies that have supported our approach to the identification and mitigation of modern slavery and human trafficking risks:

- Recruitment policy (agency workers):
The ETF uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- Procurement policy:
The ETF is committed to ensuring that our Suppliers adhere to the highest ethical standards. They are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the ETF's Supplier Code of Conduct will lead to the termination of the business relationship.
- Whistleblowing policy:
We encourage all our staff, Suppliers and other third-party stakeholders to report any concerns related to the direct activities, or the activities of our supply chains (including their subcontractors) to the ETF. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation or victimisation.
- Anti-Slavery and Human Trafficking Policy
The policy that underpins this statement and ensures that we have a clear message to our staff, Suppliers and other stakeholders of our zero tolerance approach to modern slavery and human trafficking, and our collective responsibilities to conduct

due diligence where relevant and to report any suspected or actual identified incidents through the appropriate channels.

- **Anti-Bribery Policy:**

Linked to our Hospitality and Gifts Policy, this document outlines the ETF's commitment to carrying out its business fairly, honestly and openly. It provides a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption; unethical or unlawful behaviour and gives clear, practical and proportionate preventative measures.

- **Employee code of conduct:**

This sets out its expectations and principles for what the ETF considers to be appropriate workplace behaviour. We strive to maintain the highest standards of employee conduct and ethical behaviour, and this extends to how we manage our supply chains.

- **Values and Behaviours (expected of our staff):**

Our values underpin our approach in supporting the continual transformation of the technical and vocational education system in the UK, but they also reflect our ethos and culture. Developed by our staff, they guide us in how we work with our Suppliers and stakeholder and how we behave and operate as a team.

Our values are to be Responsive; Inclusive; Expert; Trustworthy and to Strive for Excellence.

Responsibilities

Responsibility for the organisation's anti-slavery policy is as follows:

- Senior Leadership Team sign-off the original Anti-Slavery Policy and subsequent reviews.
- Business Strategy Director owns Policy.
- Procurement Manager oversees, reviews (and updates where appropriate) the Policy.
- Head of HR owns the Whistleblowing, Employee and Recruitment Policies.
- Governance Director owns the ETF policies review process.
- Business Processes Manager manages the policies review process.

Training

Our Procurement team are members of the Chartered Institute of Procurement and Supply (CIPS) and as such adhere to their Corporate Code of Conduct¹. Our procurement processes support and comply with a commitment to reinforcing ethical values across all our

¹ <https://www.cips.org/en-GB/who-we-are/governance/cips-code-of-conduct/>

procurement and supply practices, which includes modern slavery and human trafficking, in line with CIPS' Code of ethics².

Our Procurement team either hold or are working towards a CIPS qualification which includes ethical and responsible sourcing. Knowledge is refreshed and updated as part of ongoing CPD. They also endeavour to ensure that wider ETF staff are aware of the principles and impact of modern slavery and human trafficking for us, including:

- Our purchasing practices (which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline);
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available.
- What messages, business incentives or guidance can be given to Suppliers and other business partners and stakeholders to implement anti-slavery policies; and
- What sanctions we can / should take against Suppliers who are found to be engaging in slavery, human trafficking or related activities.

Approval

This statement was approved on 16 March 2020 by the ETF's Senior Management Team.

² <https://www.cips.org/en-GB/cips-for-business/performance/ethics/corporate-code-of-ethics/>