

ETF MODERN SLAVERY STATEMENT

Introduction

The Education and Training Foundation (ETF) is committed to tackling any modern slavery and human trafficking in our supply chains and any part of our business. This statement reflects our ongoing commitment to act ethically and with integrity in all our business relationships, and to enforcing a risk-based approach and related processes to tackle any slavery and human trafficking 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 annual Modern Slavery Statement for the financial years 1 April 2022 to 31 March 2023.

Organisational structure and supply chains

The ETF was established in August 2013 as the government-backed, sector-led workforce development body for the Further Education (FE) and Training sector. We design, develop and deliver continuous professional development (CPD) 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 education and training for learners aged 14 and over at the core of our operations, and this is achieved through empowering sector professionals.

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

Risk Assessment

ETF will risk assess our supply base and our procurement activity to identify risk based on:

- The nature of the Goods / Works / Services supplied
- The geographic location of the suppliers and its supply chain

Due diligence

Based on the Risk Assessment ETF will carry out one of more of the following actions:

- Self-Certify – For low-risk supply, suppliers will be asked to certify that they:
 - 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

In addition, for activities that are **not** assessed as low risk then ETF will use a range of measures depending on the nature of the supply and the size and scale of the Procurement:

- Commit to our policies and procedures
- Check for Modern Slavery Statement (depending on size of organisation)
- Request and assess their processes for pro-actively tackling Modern Slavery including ensuring compliance in delivering the ETF contract

Terms and Conditions

Our terms and conditions contain specific clauses regarding Modern Slavery.

Existing Suppliers

We review supply risk on a regular basis throughout the life of the contract

We will invoke sanctions against Suppliers that seriously violate our Supplier Code of Conduct, including the termination of the business relationship.

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.

Relevant policies

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

- Recruitment Procedure (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
- Commissioning and 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.
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

- **Modern 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 and Standards of Behaviour Policy:**

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 England, but they also reflect our ethos and culture. Developed by our staff, they guide us in how we work with our Suppliers and stakeholders, 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 policies are as follows:

- All ETF policies include:
 - Name of the Director responsible for the document
 - The originating author, descriptions of updates, the reviewer and the approving party
- New and updated policies are approved by:

- The ETF Board or Senior Leadership Team (SLT), where appropriate to the content of the policy
 - The relevant Director, where only light-touch revisions have been made to an existing policy
- Board sub-committees will receive policies for information, or for recommending Board final approval, where content is within the committee's remit
- The Board will receive all policies for information, when not already receiving for final approval
- All ETF staff receive new or updated policies. Staff are required to read the policies and uphold the practices and our values featured within, challenging (where appropriate) and/or reporting non-compliance to their managers. On occasion, certain policies may be circulated to smaller groups of staff, e.g. line managers, depending on the policy content
- All ETF policies are reviewed regularly to maintain currency, accuracy and compliance with relevant legislation. The review cycle is led by the Head of Compliance.

Training

Our procurement processes support and comply with a commitment to reinforcing ethical values across all our procurement and supply practices, which includes modern slavery and human trafficking, in line with the Chartered Institute of Procurement and Supply's Code of Ethics. They also endeavour to ensure that wider ETF staff are aware of the principles and impact of modern slavery and human trafficking

Approval

This statement was approved on 3 October 2022 by the ETF's Senior Leadership Team.