

# ETF MODERN SLAVERY STATEMENT

## Introduction

The Education and Training Foundation (ETF) is committed to addressing modern slavery and human trafficking within our operations and supply chains. We are dedicated to ethically and with integrity in all relationships, enforcing a risk-based approach with processes to combat slavery and human trafficking across our corporate and charitable activities. This commitment extends to all our suppliers and aim to work only with those who share our values.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ETF's annual Modern Slavery Statement for the financial year 1 April 2025 to 31 March 2026.

## Organisational Structure and Supply Chains

Established in August 2013, ETF is the government-backed, sector-led workforce development body for the Further Education (FE) and Training sector in England. We support teachers and leaders to achieve their professional development goals, ultimately benefitting learners and employers and contributing to economic growth.

We are the guardian of the Professional Standards for the sector and the professional membership body for the Society for Education and Training (SET). ETF is a registered charity focused on improving education and training for learners aged 14 and over by empowering sector professionals. Our operations are currently limited to England.

## Risk Assessment

ETF conducts annual risk assessments across our supply base and procurement activity, focusing on:

- The type of goods, works, or services provided.
- The geographical location of suppliers and their supply chains
- The supplier's workforce practices and subcontracting arrangements (if applicable)

## Due Diligence

For activities identified as **non** low-risk, ETF applies a range of measures based on the nature, size, and scale of the procurement. These may include:

- Requiring suppliers to commit to ETF's relevant policies and procedures
- Reviewing the Supplier's Modern Slavery Statement (where applicable)
- Requesting evidence of how the supplier mitigates modern slavery risks and complies with ETF contract terms.

In FY 2025–26, ETF will explore due diligence approaches for low-risk suppliers and spend areas, taking into account:

- Proportional mitigation strategies
- Resource requirements versus impact
- Minimising barriers for SMEs

## Terms and Conditions

ETF's standard contract terms include specific clauses prohibiting modern slavery and human trafficking and require suppliers to uphold relevant legal and ethical standards.

## Existing Suppliers

We regularly review supply risk throughout the contract lifecycle.

If a supplier is found to be in serious breach of ETF's Supplier Code of Conduct, sanctions, including contract termination may be applied.

## High-Risk Activities

Activities considered high risk for slavery or human trafficking are identified through our due diligence processes and addressed accordingly.

## Relevant Policies

ETF has implemented several policies to support the identification and mitigation of modern slavery and human trafficking risks:

- **Recruitment Procedure (Agency Workers):**  
ETF only works with specified, reputable employment agencies and verifies their practices before accepting workers.
- **Commissioning and Procurement Policy:**  
Requires Suppliers to uphold ethical standards, provide safe working conditions, and act within the law.
- **Income Management Policy:**  
Sets guidelines to ensure consistent contract execution and financial performance, while mitigating financial risk.
- **Whistleblowing Policy:**  
Encourages staff, Suppliers, and stakeholders to report concerns related to ETF or its supply chains, including suspected modern slavery. The policy ensures disclosures can be made safely and without fear of retaliation.
- **Modern Slavery and Human Trafficking Policy:**  
Underpins this statement and communicates ETF's zero-tolerance approach to modern slavery, outlining due diligence expectations and reporting procedures.
- **Anti-Bribery Policy:**  
Reinforces ETF's commitment to fair and transparent practices. Linked to our Hospitality and Gifts Policy, it defines what constitutes bribery and outlines preventative measures.

- **Employee Code of Conduct and Standards of Behaviour Policy:**  
Describes expectations for staff conduct and ethical behaviour, including how we manage relationships with Suppliers.
- **ETF Values and Behaviours:**  
Our values—Responsive, Inclusive, Expert, Trustworthy, and Strive for Excellence—inform our approach to working with Suppliers and reflect our organisational culture.

## Responsibilities

Policy ownership and governance responsibilities include:

### ETF's policy governance framework includes:

- **Accountability:** Each policy names the responsible Director, author, reviewer, approver, and a summary of updates
- **Approvals:**
  - **Major updates:** Approved by the ETF Board or Senior Leadership Team
  - **Minor updates:** Approved by the relevant Director.
- **Board oversight:** All policies are shared with the Board for information.
- **Communication:**
  - Staff are expected to comply, challenge, or report non-compliance as appropriate.
  - Some policies are targeted to specific roles (e.g. line managers)
- **Review cycle:** Policies are regularly reviewed for accuracy and compliance

## Training

ETF aligns its procurement practices with the Chartered Institute of Procurement and Supply's Code of Ethics. We ensure that relevant staff receive training and guidance on identifying, preventing, and responding to modern slavery and human trafficking risks.

## Approval

This modern Slavery Statement was approved on 6<sup>th</sup> June 2025 by Chair's action.