

ETF MODERN SLAVERY STATEMENT

Financial Year 1 April 2026 to 31 March 2027

Published in accordance with Section 54 of the Modern Slavery Act 2015.

Introduction

Education Training Foundation (ETF) is committed to addressing modern slavery and human trafficking within our operations and supply chains. We are dedicated to acting ethically and with integrity in all relationships, taking a risk-based approach and implementing robust processes to combat slavery and human trafficking across all our corporate and charitable activities.

This commitment extends to all our suppliers, and we aim to work only with organisations that share our values and ethical expectations. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ETF's annual Modern Slavery and Human Trafficking Statement for the financial year 1 April 2026 to 31 March 2027.

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 Skills sector in England. We support teachers, trainers, leaders and organisations to achieve their professional development goals, ultimately benefiting learners, employers and the wider economy.

ETF is the guardian of the Professional Standards for the FE and Skills sector and provides professional membership, recognition and workforce development services to practitioners, leaders and organisations across the sector. ETF is a registered charity focused on improving education and training for learners aged 14 and over by empowering sector professionals.

As an SME operating in the professional development sector, our supply chain primarily consists of professional service providers, training partners, digital and

technology suppliers, learning platform providers, event venues and associated support services.

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, where applicable

ETF has assessed the overall risk of modern slavery within its direct workforce as low. However, recognising that modern slavery risks can arise indirectly through supply chains, the organisation focuses its risk assessment activities on outsourced services, facilities management, agency workers, event provision, technology supply chains and subcontracted delivery arrangements.

We apply a proportionate, risk-based approach that reflects our size, resources and the generally low-risk nature of our sector.

Due diligence

For activities identified as presenting a higher level of risk, ETF applies a range of measures proportionate to 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 contractual requirements.
- Assessing the use of subcontractors and overseas delivery arrangements where relevant

During FY 2026–27, ETF will continue to strengthen proportionate due-diligence arrangements, taking into account:

- Proportional mitigation strategies
- Resource requirements versus impact
- Minimising barriers for SMEs
- Continuous improvement of supplier assurance processes

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. We will continue to review and update these clauses to reflect evolving best practice and emerging legislative or regulatory requirements.

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. Where appropriate, we will work collaboratively with suppliers to support corrective action before any escalation.

High-risk activities

Activities considered higher risk for slavery or human trafficking are identified through ETF's due diligence processes and addressed accordingly. Although ETF's operations are generally considered low risk, certain activities may present elevated risk and therefore require enhanced scrutiny, including:

- Event-related services and temporary staffing
- Facilities management and associated contracted services
- Agency workers and labour supply arrangements
- Subcontracted programme delivery
- Digital and technology services involving complex international supply chains

ETF also recognises that modern slavery risks can arise within global technology and software supply chains where services may be delivered through international subcontracting arrangements. Whilst ETF's direct suppliers are predominantly UK-based organisations, appropriate due diligence is undertaken where overseas delivery models are identified.

Relevant policies

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

- Recruitment Procedure (Agency Workers)
- Commissioning and Procurement Policy
- Income Management Policy:
- Whistleblowing Policy
- Modern Slavery and Human Trafficking Policy
- Anti-Bribery Policy

- Employee Code of Conduct and Standards of Behaviour Policy
- ETF Values and Behaviours

We will continue to review these policies to ensure they remain aligned with best practice, emerging risks and evolving legal requirements.

Monitoring and effectiveness

ETF monitors the effectiveness of its approach to preventing modern slavery and human trafficking through:

- Annual review of supplier risk assessments
- Monitoring procurement activity and supplier onboarding processes
- Review of whistleblowing reports, safeguarding concerns and reported ethical issues
- Monitoring supplier compliance with contractual obligations
- Periodic review of procurement policies, procedures and training arrangements
- Ongoing review of identified high-risk supplier relationships

During FY 2026–27, ETF will continue to develop proportionate monitoring arrangements that strengthen supplier assurance whilst remaining appropriate for SMEs and low-risk suppliers.

Responsibilities

Policy ownership and governance responsibilities include:

- **Accountability:** Each policy names the responsible Director, author, reviewer, approver, and a summary of updates
- **Approvals:** major updates are approved by the Board or Senior Leadership Team; minor updates by Directors
- **Board oversight:** All policies shared with the Board for information
- **Communication:** staff are expected to comply, challenge, or report non-compliance
- **Review cycle:** Policies regularly reviewed for accuracy and compliance

Through training, staff are informed of internal reporting routes for modern slavery concerns and are supported to understand how to escalate issues appropriately.

Training

ETF aligns its procurement practices with professional procurement standards and ethical sourcing principles.

All staff receive training and awareness information relating to modern slavery and human trafficking. Relevant staff involved in procurement, supplier management and contract oversight receive additional guidance on identifying, preventing and responding to modern slavery risks within supply chains.

Where staff manage higher-risk contracts — such as facilities management, outsourced services or significant supplier relationships — additional training and support will be provided through ETF's learning and development framework.

Future commitment

As ETF continues its organisational transition and implementation of its Target Operating Model, the organisation remains committed to ensuring that ethical procurement, responsible supplier management and modern slavery prevention remain embedded within all future commercial, digital and operational activities. We will keep our approach under active review and continue to strengthen our processes proportionately as the organisation evolves.

Board approval

This statement was approved on 5th June 2026 by Chair's action and will be published on ETF's website in accordance with Section 54 of the Modern Slavery Act 2015.

The Board recognises its responsibility for ensuring that ETF maintains appropriate systems, controls and governance arrangements to minimise the risk of modern slavery and human trafficking occurring within its operations and supply chains.

This statement covers the financial year 1 April 2026 to 31 March 2027 and will be reviewed annually.