

| TITLE                           | VERSION |
|---------------------------------|---------|
| Modern Slavery Policy 2025-2026 | 6       |

| APPROVAL BODY      | DATE      | REVIEW DATE |
|--------------------|-----------|-------------|
| Board of Governors | August 25 | August 26   |

|             |                        |
|-------------|------------------------|
| LEAD PERSON | Director of Operations |
|-------------|------------------------|

## POLICY STATEMENT

VLUK considers modern slavery to be an umbrella term for all forms of slavery, servitude, forced or compulsory labour and human trafficking. The Modern Slavery Act 2015 ('the Act') combats modern slavery and consolidates previous offences relating to trafficking and slavery. This policy lays out the steps taken by VLUK to ensure that there is no slavery or human trafficking taking place in the organisation or in our supply chains.

## BACKGROUND

VLUK is a National Independent Training Provider, delivering education in the 16-19 FE sector. It is part of The Oxford Virtual Education Group. VLUK is led by a Chief Executive Officer, accountable to a Board of Governors and Group Chief Executive Officer and supported by an Executive team and a Senior Leadership Team (SLT). Accountable to the SLT is a layer of middle management located throughout the country. The Middle Leadership team is responsible for tutors and enrichment staff.

## PURPOSE

The purpose of this policy is:

- To develop and support awareness of VLUK's responsibilities under the Act and provide staff with appropriate tools for them to act if they suspect a case of slavery or human trafficking.
- To remove the risk of modern slavery in any supply chains.
- To help ensure staff involved in procurement activity are aware of and follow modern slavery procurement guidance on GOV.UK.
- To ensure that consideration of the modern slavery risks and prevention are added to VLUK's policy review process as an employer and procurer of goods and services.
- To ensure procured contracts include references to modern slavery and human trafficking.
- To support and embed a zero-tolerance approach towards modern slavery.

## SCOPE

This policy applies to all staff involved in recruitment and procurement of services at VLUK, including, but not limited to Governors, Executive Team, Senior Leadership Team, Middle Leaders, Tutors and Support Staff. It confirms VLUK's approach to Modern Slavery.

## DEFINITIONS

### Modern Slavery:

An umbrella term for all forms of slavery, servitude, forced or compulsory labour, and human trafficking.

**Slavery:**

The condition in which one person is owned by another. A person who is enslaved is deprived of most of the rights ordinarily held by free persons.

**Servitude:**

A condition in which a person is forced to work against their will, under the threat of punishment, and is unable to leave.

**Forced or Compulsory Labour:**

Any work or service that a person is forced to do against their will under the threat of punishment. This includes situations where individuals work under coercion or deception.

**Human Trafficking:**

The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force, or other forms of coercion, abduction, fraud, deception, abuse of power, or a position of vulnerability, for the purpose of exploitation. Exploitation can include prostitution, forced labour, slavery, or similar practices.

**Exploitation:**

The act of treating someone unfairly to benefit from their work. This includes forced labour, sexual exploitation, removal of organs, and any other form of exploitation for economic gain.

**Child Labour:**

Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. This includes work that interferes with their schooling.

**Bonded Labour (Debt Bondage):**

A person's pledge of their labour or services as security for the repayment of a debt or other obligation. The terms of the repayment are often not clearly or reasonably stated, and the person is trapped in a cycle of debt.

**Coercion:**

The practice of persuading someone to do something by using force or threats. In the context of modern slavery, it refers to the use of violence, threats, or intimidation to force someone to work or comply.

**Deception:**

The act of misleading someone into a situation by falsely representing the truth. In modern slavery, it often involves deceiving individuals about the nature of their work, working conditions, or terms of employment.

**Harbouring:**

The act of providing shelter or refuge to someone who is being trafficked or held in conditions of slavery, often as part of the human trafficking process.

**National Referral Mechanism (NRM):**

A framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate protection and support.

**RESPONSIBILITIES**

|                           |                                                                                                                                                                                    |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Board of Governors</b> | The Governing Board or a delegated committee review and challenge the effectiveness of the internal controls and the management of risk detailed in this policy.                   |
| <b>Chief Executive</b>    | Overall responsibility for ensuring VLUK resources are used effectively and appropriately. Ensure all new contracts and partnerships are compliant with the modern slavery policy. |

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| <b>Lead Person: Director of Operations</b> | Responsible for ensuring the policy aligns with regulatory requirements and best practice. |
| <b>All Line Managers</b>                   | Responsible for ensuring all employees are aware of and follow this policy.                |
| <b>All Employees and Volunteers</b>        | To follow policies and procedures, promoting best practice throughout the organisation.    |

## **POLICY - BACKGROUND**

VLUK is committed to the principles of the Act and the abolition of modern slavery and human trafficking.

As an equal opportunities' employer, VLUK is committed to creating and ensuring a non-discriminatory and respectful working environment for all staff. We want all staff to feel confident that they can expose wrongdoing without any risk to themselves. VLUK's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

VLUK does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

VLUK has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all activities and relationships, implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We seek to include in our contracts specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

We procure a wide range of goods, services and works to deliver our activities. This includes the purchase of office and cleaning supplies, professional services, IT equipment and services, and facilities works, goods and services. Each of these hold risks in relation to modern slavery and human trafficking.

We are committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements, and contracts, with suppliers, contractors and other partners that share and adhere to this vision. Any contract terms and conditions with suppliers must include references to modern slavery and human trafficking.

## **POLICY - DUE DILIGENCE**

Due diligence is undertaken on any new supplier to ensure compliance with the Act. Suppliers are asked to provide evidence of their compliance with the Act, to ensure they act ethically and within the law.

The Government's Modern Slavery Statement Registry is reviewed to check for the publication of Modern Slavery Statements and where not published, suppliers are asked to share their statement, policy or approach to this.

VLUK does not support or deal with any business knowingly involved in slavery or human trafficking.

## **POLICY - RECRUITMENT**

All recruited staff following a robust process to ensure all those employed have the legal right to live and work within the UK. All candidates are required to provide documentary evidence of their right to work in the UK and their identity. Evidence should be as prescribed by UK Visas and Immigration and the Disclosure and Barring Service.

Where recruitment is outsourced to a third-party agency, only specified, reputable employment agencies are used. The practices of any new agency are verified before accepting workers from that agency; with the same checks required to be undertaken.

We also verify that the minimum wage requirements of any agency staff are met. This relates to the outsourcing of services, for example where agency staff are used for the cleaning of premises.

### **POLICY - TRAINING**

Procedures are in place to ensure that this policy is understood and communicated to all levels of the organisation. We provide training to managers and other staff as appropriate to help improve awareness of modern slavery, help them to identify risks and ensure they understand their responsibilities.

### **POLICY - RESPONDING TO AN INCIDENT OF MODERN SLAVERY**

If anyone is concerned, they may have come across an instance of modern slavery they should contact the Director of Operations who will contact the **Modern Slavery Helpline on 0800 0121 700** for information and guidance on what to do next.

If VLUK identifies a potential victim of modern slavery they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered government-funded support. Referral for potential adult victims is by consent. If a case of modern slavery is identified in the UK, it should be reported to the police immediately.

If the incident relates to a supplier, guidance should be shared in relation to the implementation of anti-slavery policies. If, after receiving support, the supplier is not taking the issue seriously, we will terminate our commercial relationship with the supplier. External stakeholders can report any concerns of modern slavery via our Comments and Complaints Policy.

### **POLICY - SLAVERY AND HUMAN TRAFFICKING STATEMENT**

VLUK volunteers to publish a slavery and human trafficking statement annually. Publishing an annual statement demonstrates transparency and progress against prior years.

The statement is reviewed annually after the end of the academic year, approved by the Board of Governors, and published on our website. The statement provides the steps taken to address and remedy human trafficking within the organisation and our supply chain and includes information on the following:

- Company structure, business, and supply chains.
- Policies in relation to slavery and human trafficking.
- Any due diligence processes in relation to slavery and human trafficking within VLUK and of our supply chains.
- The parts of the organisation and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk.
- The effectiveness in ensuring that slavery and human trafficking is not taking place in the organisation and supply chains, measured against such performance indicators as it considers appropriate.
- Any training and capacity building about slavery and human trafficking available to staff.

### **POLICY - MODERN SLAVERY STATEMENT**

VLUK provides a range of services to the education sector, from CPD and teacher training, through to full time education programmes for young people. We are an approved government provider, educating over 1500 young people aged 16-24 each academic year at Levels 2-5.

Modern slavery is a crime and a violation of fundamental human rights under the Modern Slavery Act 2015 ('the Act'). It takes various forms such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

VLUK procures a wide range of goods, services and works which are sourced from both national and international suppliers.

VLUK is committed to ethical business practices and acknowledges that we have a responsibility to take a robust approach to our own practices and those in our supply chains, to protect some of the most vulnerable people in society. VLUK is committed to a zero-tolerance policy in relation to modern slavery and human trafficking.

## COMPLAINTS

Complaints about this modern slavery policy should be made to the Director of Operations [Gemma.Halsey@vluk.org](mailto:Gemma.Halsey@vluk.org) in the first instance. Following this, and if required, please refer to the VLUK comments & complaints policy.

## REFERENCES

Comments and Complaints Policy

Safer Recruitment Policy

<https://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>

<https://www.antislaverycommissioner.co.uk/help-support/transparency-in-supply-chains-a-practical-guide-accessible>

<https://www.slavefreealliance.org/>

<https://hopeforjustice.org/>

<https://www.unglobalcompact.org.uk/>

<https://www.un.org/Depts/ptd/about-us/un-supplier-code-conduct>

<https://sdgs.un.org/topics/employment-decent-work-all-and-social-protection>

<https://sdgresources.relx.com/videos-webinars/relx-responsible-supplier-sessions-exploring-themes%C2%A0including-living-wage>

## SIGNATORIES



Chief Executive Officer  
15th August 2025



Chair of Governors  
15th August 2025