Virtual Learning uk

TITLE	VERSION
Modern Slavery Policy 2026-2027	6

APPROVAL BODY	DATE	REVIEW DATE
Board of Governors	August 26	August 27

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:

- Develop and support awareness of VLUK's responsibilities under the Act and provide staff with appropriate tools to act if they suspect a case of slavery or human trafficking.
- Remove the risk of modern slavery in all supply chains.
- Ensure staff involved in procurement activity are aware of and actively follow modern slavery procurement guidance on GOV.UK and utilise the UK Government's Modern Slavery Statement Registry.
- Ensure that consideration of modern slavery risks and prevention are embedded into VLUK's policy review process as an employer and procurer of goods and services.
- Ensure all newly procured contracts include explicit clauses referencing compliance with modern slavery and human trafficking legislation.
- Support and embed a zero-tolerance culture towards modern slavery throughout the organisation.

SCOPE

This policy applies to all individuals involved in recruitment, procurement of services, and educational delivery at VLUK. This includes, but is not limited to, Governors, the Executive Team, the Senior Leadership Team, Middle Leaders, Tutors, Support Staff, and Volunteers.

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, depriving them of most 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 legally or practically unable to leave.

- **Forced or Compulsory Labour:** Any work or service extracted from a person under the menace of penalty and for which the person has not offered themselves voluntarily.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, force, coercion, abduction, fraud, or deception for the purpose of exploitation.
- **Exploitation:** Treating someone unfairly or unethically to benefit from their work (including forced labour, sexual exploitation, and economic gain).
- **Child Labour:** Work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development or interferes with schooling.
- **Bonded Labour (Debt Bondage):** A person's pledge of their labour or services as security for the repayment of a debt where the terms are undefined, unfair, or coercive.
- **National Referral Mechanism (NRM):** The official UK framework for identifying and ensuring victims of human trafficking or modern slavery receive appropriate protection and support.

RESPONSIBILITIES

Board of Governors	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.
Chief Executive	Holds overall responsibility for ensuring VLUK resources are used effectively and appropriately, and ensuring all new contracts and partnerships are legally compliant with this policy.
Lead Person: Director of Operations	Responsible for ensuring the policy aligns with regulatory requirements and best practice.
All Line Managers	Responsible for ensuring that all employees within their teams are aware of, understand, and follow this policy
All Employees and Volunteers	Expected to follow policies and procedures, maintain vigilance during daily operations, and promote best practices throughout the organisation

POLICY - BACKGROUND

As an equal opportunities employer, VLUK is committed to creating a non-discriminatory and respectful working environment. We want all staff to feel confident that they can expose wrongdoing without risk to themselves. Staff who raise concerns regarding modern slavery are fully protected against retaliation under the **VLUK Whistleblowing Policy** and the Public Interest Disclosure Act 1998.

Procurement & Supply Chains

VLUK procures a wide range of goods, services, and works, including office/cleaning supplies, professional services, IT equipment, and facilities management. We acknowledge these hold tier-level risks in relation to modern slavery.

VLUK has a zero-tolerance approach and will not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in modern slavery. All contract terms and conditions with external suppliers must include explicit clauses prohibiting the use of forced, compulsory, or trafficked labour.

POLICY - DUE DILIGENCE

The UK Government's Modern Slavery Statement Registry is reviewed to verify compliance.
Where a statement is not publicly published due to supplier size, suppliers are required to share their internal policy, approach, or sign a VLUK Supplier Code of Conduct declaration before onboarding.

POLICY - RECRUITMENT

All recruited staff must undergo a robust onboarding process to ensure legal rights to live and work within the

UK. Candidates must provide prescribed documentary evidence of identity and right to work in accordance with UK Visas and Immigration (UKVI) and the Disclosure and Barring Service (DBS) guidelines.
Where recruitment is outsourced to a third-party agency, only reputable, specified employment agencies are utilised. Agencies are verified before accepting workers, and VLUK audits to ensure that national minimum wage requirements are met for all agency staff (e.g., outsourced cleaning or facilities staff).

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 a member of staff suspects a case of modern slavery within a supply chain or external operation, they must report it directly to the Director of Operations.

- The Director of Operations will contact the **Modern Slavery Helpline on 0800 0121 700** for guidance.
- If a supplier is confirmed to have modern slavery issues and fails to take immediate, proactive remedial steps, VLUK will terminate the commercial relationship.

Safeguarding Critical Referral (Learners under 18)

Because VLUK educates young people aged 16–19, any internal suspicion or disclosure that a learner or young person is a victim of trafficking, forced labour, or exploitation must be handled with immediate safeguarding urgency.

- Urgent Action: Staff must instantly escalate the concern to the Designated Safeguarding Lead (DSL) in accordance with the VLUK Safeguarding & Child Protection Policy.
- NRM Referral Rules:
    - If the potential victim is under 18, a referral to the National Referral Mechanism (NRM) must be made immediately by the DSL as a statutory safeguarding duty. Consent from the minor is not required.
    - If the potential victim is an adult (18 or over), a referral to the NRM is subject to their explicit consent.
- Emergency: If an individual is in immediate physical danger, the police must be called via 999 immediately.

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.

To measure the ongoing effectiveness of our anti-slavery measures, VLUK monitors the following metrics annually:

- **Training Completion:** 100% of staff involved in HR, recruitment, and procurement activities completing annual Modern Slavery awareness updates.
- **Supplier Vetting:** 100% of new high-risk tier-1 suppliers (e.g., IT hardware, apparel, cleaning contractors) successfully vetted via due diligence checks before deployment.
- **Contract Compliance:** 100% of active service agreements updated with explicit anti-slavery clauses.

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 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
1st August 2026



Chair of Governors
1st August 2026