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**Slavery and Human Trafficking Statement**

**Introduction**

V Learning Net (the provider) is an adult education charity. It was formed in 2001 to provide an effective, efficient, and cost-effective partnership solution for Third Sector Training Providers of learning and skills within Devon and Cornwall.

The Mission of VLN is simple:

**To provide people in Devon and Cornwall with the opportunity to develop as individuals by delivering high-quality person-centred training and education**

In delivering this mission the Provider is committed to being a values-led organisation, with those values including trust as the foundation of our relationships and underpinned by integrity in all that we do. Accordingly, the Provider is fully committed to employing staff, engaging with and supporting students, acquiring goods, services and works, and otherwise conducting its business in an ethical way and without causing harm to others.

**Purpose of statement**

This statement is produced to demonstrate the Provider compliance with Part 6 of the Modern Slavery Act 2015, by informing all members of the Provider community and other stakeholders about the Providers policies and practices in relation to addressing the risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

**Structure and Supply Chains**

The Provider delivers learning, teaching, and engagement activities in furtherance of its core purposes and strategic objectives and in accordance with its mission, vision and values. These functions, and the underlying organisation, are supported by an array of supporting services and operations. This includes, but is not limited to:

* 1. Education, professional services and support departments directly employing staff
  2. External contractors engaged on an ongoing basis to deliver specific functions (e.g. internal and external auditors,)
  3. External suppliers from whom the Provider purchases services (e.g. tutor banks, staff recruitment agencies, PR firms)
  4. External suppliers from whom the Provider purchases goods (e.g. stationery suppliers, consumables suppliers)
  5. Partnership arrangements with other institutions or organisations which generate a pipeline of student recruitment for the Provider

In each of these arrangements there is a risk of modern slavery occurring either directly or within the supply chains associated with each of these arrangements.

The responsibility for identifying and managing the risk of modern slavery within Provider supply chains sits across the Provider’s Procurement and Governance functions.

The following procurement categories have been initially identified as higher risk in terms of potential occurrences of modern slavery and human trafficking in the supply chain;

* 1. ICT Equipment and Services;
  2. Stationery and office equipment;

**Policies**

The Provider has a zero tolerance in relation to modern slavery and human trafficking and the protection of human rights. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the Provider is not contributing to modern slavery in any way. In addition to this statement, we have in publication a number of policy statements supporting our commitment:

* + Employment and HR policies
  + Trustee Code of Conduct
  + Whistleblowing Policy

**Contracting for good and services**

The Provider acts ethically in its purchasing activities.

Our approach to procurement, outlines the commitment to obtaining value for money in all of its transactions, and in conducting its daily business, staff will consider the Providers wider responsibilities in terms of legal, moral, social, economic and environmental issues.

When procuring goods, works and services in the higher risk categories, the Provider reviews potential suppliers to ensure that they can demonstrate a practical commitment to corporate and social responsibility.

**Other contracting activities**

In agreeing other contracts with external entities, other than through the purchasing system, the Provider reviews contractual arrangements to ensure appropriate clauses are included as standard in relation to ensuring compliance with relevant laws, including the Modern Slavery Act 2015.

**Employment matters**

The Provider has robust recruitment and selection procedures and the application of these procedures, together with Whistleblowing Policy provides adequate mitigation of risk in relation to directly employed staff.

Temporary (short/fixed term staff) are engaged through two possible routes:

* 1. Directly with the Provider, they are paid a rate equivalent to the commercial pay grade for the role and are subject to employment rights for the period of any active assignment, and the Provider’s welfare provisions.
  2. Through a recruitment agency. These examples are relatively limited, as the Provider does not have heavy reliance on agency staff.

The Provider’s commitment to workplace rights for employees of the Provider are outlined in its HR policies available in the Provider staff handbook and in the employee area on SharePoint. The Whistleblowing Policy is designed to encourage employees to report any concerns which they may have about serious wrongdoing in the Provider in a responsible and appropriate manner.

**Policy review**

Enforcement of policy standards are managed by the SMT and overseen by the Charity Trustees. The periodic review of policies includes:

* + when a policy is reviewed in its normal cycle
  + when a policy is reviewed as a result of legal or regulatory changes
  + when there is a specific internal audit of a policy
  + If there is a complaint about the operation of a policy which triggers a review
  + If a concern is raised when applying the policy in practice

1. Through this process, the policies which form part of the framework for combatting modern slavery are kept under regular review.

**Due diligence**

The Provider maintains a Due Diligence focus which ensures that ethical and other principles are considered when undertaking due diligence and upon which due diligence processes for specific activities are based.

Further to this, the Provider is committed to a better Provider understanding of its supply chains and will work towards greater transparency in this area in this and future years.

Where the Provider assists students with careers or enters into partnerships due diligence exercises are carried out by the relevant teams in the Provider and where appropriate decisions are made by specified committees.

**Risk Assessment and Management**

The Provider’s risk management framework includes consideration of the risk of modern slavery. This is captured through legal, regulatory and people risks, in terms of ensuring adherence of the due diligence process, ensuring fair and legal conditions of employment and maintaining compliance with our regulatory obligations.

These risks are kept under review on an ongoing basis ensuring detailed scrutiny and oversight. Reporting if required to the Trustees Board.

**Effective Action to Address Modern Slavery**

The Provider will review its arrangements for managing modern slavery, and the documentation of these arrangements, against the Ethical Trading Initiative Modern Slavery Statement Framework and will develop an action plan for further activity to ensure that its practice and statement reflect this best practice. This action plan will be developed in the 2021-22 Academic Year, with the completed actions to be reflected in the Modern Slavery Statement 2022, to be approved in November 2022.. It will be taken forward in 2021-22 as part of a wider review of the Provider’s Ethical Framework.

* 1. To date no issues or concerns have been raised which have required action and no incidents have been recorded. However ongoing plans for training, due diligence and risk management may provide further assurance of any suspected unlawful or actual unlawful activity and reporting requirements will be built into policies as a reminder of the need to record reports and take action where necessary.

**Further Information**

* 1. Any concerns or questions about matters related to this Statement should be addressed to the Provider CEO, in the first instance.
  2. This statement has been reviewed and approved by the Provider’s SMT and will be further reviewed on an annual basis.