



**Modern Slavery and  
Human Trafficking Policy Statement  
(Modern Slavery Act 2015)**

<b>Purpose</b>	
Statement of compliance with the Modern Slavery and Human Trafficking Act 2015	
<b>Key words</b>	
Modern Slavery and Human Trafficking	
<b>Document Control Number:</b>	320
<b>Version:</b>	3
<b>Date Adopted:</b>	23 November 2017
<b>Name of Owner:</b>	Sophia Franzen
<b>Title of Owner:</b>	Operations Director
<b>Name of Responsible Group:</b>	Executive Management Team
<b>Date issued for Publication:</b>	November 2017
<b>Expiry Date:</b>	March 2024
<b>Review Date:</b>	March 2024
<b>Review Details:</b>	<p>Reviewed 07.10.2020 no changes made.</p> <p>Reviewed 17.03.2023 no changes made.</p> <p>Reviewed 07.12.2023 changes made</p> <ul style="list-style-type: none"> <li>• Expanded to become a full policy and statement</li> <li>• Further detail of policies that support the statement</li> <li>• Further detail added regarding supply chain</li> <li>• New policy owner</li> </ul>
<b>Target Audience:</b>	Staff, Learners, Customers, Prime Providers, OfSTED, Standards Awarding Bodies

## **Introduction**

Acorn Training Ltd is a private limited liability company wholly owned by Gareth Fallows, who is also Chief Executive Officer to the business.

Acorn Training Ltd is an Independent Training Provider (SME) in the UK, providing employability, skills and justice services nationally. All companies within the Acorn Training Ltd group uphold the same company Vision, Mission and Core Values and follow our group policies and procedures. Acorn Training Ltd acknowledges its responsibilities in relation to tackling Modern Slavery and is committed to complying with the provisions and guidance in the Modern Slavery Act 2015. Acorn Training Ltd understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Acorn Training Ltd does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery and forced or compulsory labour. No labour provided to Acorn Training Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Acorn Training Ltd strictly adheres to at least the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## **Applies to**

This statement applies to all operations and employees within Acorn Training Ltd and its Supply Chains.

## **STATEMENT**

This statement sets out Acorn Training Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024 and will be reviewed every year before its expiry.

As part of the employability, skills and justice sectors, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that any supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Acorn Training Ltd:

Acorn Training Ltd is a national employment, skills and justice specialist working with employers and participants to help them achieve success.

Since 2008, Acorn Training Ltd has grown organically to become one of the most diverse providers in the country, supporting the employability, skills and justice sectors.

Acorn Training Ltd work in partnership with the Department for Work and Pensions (DWP) and alongside Job Centre Plus (JCP) offices in the localities in which we serve, supporting long term unemployed claimants into sustainable work.

Acorn Training Ltd utilise a variety of funding streams to work with employers throughout the UK, supporting impactful training that help them meet core organisational objectives such as performance and output. These include the provision of short-term vocational qualifications to the employed and unemployed to longer-term apprenticeships. Acorn Training Ltd supports in excess of 2,000 employers every year with their workplace training and recruitment needs.

Since 2015 Acorn Training Ltd have supported in excess of 26,000 justice participants, providing a range of services in partnership with His Majesty's Prison and Probation Service (HMPPS). Acorn Training Ltd deliver services in the secure environment, through the gate and within local communities. Our 360° approach ensures we are well-equipped to cover all aspects of the rehabilitation journey.

### **Countries of Operation and Supply**

Acorn Training Ltd currently only operate in the United Kingdom and are directly funded by the Education Skills Funding Agency (ESFA), Devolved Authorities, DWP and the Ministry of Justice (MOJ). Acorn Training Ltd is one of the largest CIAG providers to the Ministry of Justice, delivering in 19% of the HMP estates.

## High-Risk Activities

Given the robust UK legislative framework the risk of infringement for our employees and supplier employees working in our centres is low. We recognise our responsibility to identify and address potential infringements linked to the goods and/or services we procure. Therefore, we have policies and procedures in place to ensure that our suppliers adhere to the same standards as we apply to ourselves.

## Responsibility

The Chief Executive Officer and the Executive Management team shall take responsibility for implementing this policy statement and its objectives, and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

## Relevant Policies

The organisation operates the following policies/procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing Policy** - The organisation encourages all employees, customers, and other stakeholders to report any concerns related to the direct activities, or the supply chains of Acorn Training Ltd. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to be easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete the Acorn Training Ltd Whistleblowing report form.

**Employee Code of Conduct** - This sets out expectations and principles for what the Acorn Training Ltd considers to be appropriate workplace behaviour.

**Acorn Training Ltd Core Values**- Our Core Values make clear to employees the actions and behaviour expected of them when representing the Acorn Training Ltd. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

**Procurement Policy** – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with our suppliers to ensure that they meet the highest standards of ethics and improve their worker's working conditions. However, serious violations of these standards will lead to the termination of the business relationship.

**Safeguarding Child and Adult at Risk Policy** - Our commitment to safeguarding is reflected in our Core Values and behaviours. Where we have

concerns, we are respectful and considerate, particularly when making decisions that impact others. We choose the most appropriate method in which to raise concerns, collaborate with external agencies and organisations, proactively forging and maintaining working relationships to help protect those most at risk. We ensure that our employees are fully aware of potential risks to participants and are able to raise concerns to ensure we protect and support the most at-risk groups we work with.

**Recruitment and Selection Policy** - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency.

All candidates are to provide prior to interview documentary evidence of their right to work in the UK and their identity. Evidence should be as prescribed by the current UK Visas and Immigration and the Disclosure and Barring Service.

An offer of appointment to any successful candidate is conditional upon:

- Receipt of three written references, a minimum of two employer including the latest employer
- Verification of the candidate's identity
- A basic, standard, or enhanced Disclosure and Barring Service check, depending on role, which includes a check of the Barred Lists, including an overseas 'Certificate of Good Conduct' or equivalent
- Evidence of permission to work for those who are not nationals of a European Economic Area country
- Verification of qualifications

All checks will be:

- Confirmed in writing
- Documented and retained on the personnel file (subject to restrictions on the retention of information imposed by Disclosure and Barring Service regulations)
- Followed up where they are unsatisfactory or where there are discrepancies in the information provided

## **Due Diligence**

As part of the company's due diligence processes into slavery and human trafficking, the supplier appraisal form and approval process reviews the controls undertaken by the supplier to ensure they comply with our Procurement Policy and that they act ethically and within the law.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

Additional procedures ensure that this statement is understood and communicated to all levels of the company, and that it is regularly reviewed by the Executive Management team to ensure its continuing suitability and relevance to the Company activities.

**Approval**

This statement was updated on 7<sup>th</sup> December 2023 by Acorn Training Ltd's Executive Management team, who review and update it annually.

Signed: Sophia Franzen – Operations Director

Date: 07.12.2023