



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

Purpose	
Statement of compliance with the Modern Slavery and Human Trafficking Act 2015	
Key words	
Modern Slavery and Human Trafficking	
Document Control Number:	320
Version:	4
Date Adopted:	23 November 2017
Name of Owner:	Sophia Franzen
Title of Owner:	Chief Operating Officer
Name of Responsible Group:	Executive Management Team
Date issued for Publication:	November 2017
Expiry Date:	March 2027
Last Review Date:	20/03/2026
Review Details:	Version 6 – fully reviewed and updated
Target Audience:	Staff, Learners, Customers, Prime Providers, Ofsted, Standards Awarding Bodies

Modern Slavery and Human Trafficking Statement

(Published in accordance with Section 54, Modern Slavery Act 2015)

1. Introduction

Acorn Training Ltd is an Independent Training Provider (SME) delivering national employability, skills and justice services. The organisation acknowledges its responsibility under the Modern Slavery Act 2015 and is committed to ensuring that slavery and human trafficking does not occur within its operations or supply chains. Acorn Training recognises that this requires ongoing assurance, monitoring and continuous review of internal practices and procurement arrangements

2. Organisation Structure, Operations and Supply Chains

Acorn Training Ltd is wholly owned by the Chief Executive Officer and delivers services across the UK in the employability, skills and justice sectors

Our delivery includes:

- Employability programmes in partnership with the Department for Work and Pensions (DWP) and local Jobcentre Plus networks
- Apprenticeships and vocational training funded by Department for Education (DfE) and Combined Authorities
- Justice programmes delivered in partnership with His Majesty's Prison and Probation Service (HMPPS) and the Ministry of Justice (MOJ)
- Commissioned programmes through Local Authorities

Supply chains include (but are not limited to):

- IT equipment and infrastructure
- Estates and facilities
- Learning materials and digital resources
- Recruitment and staffing agencies
- Subcontractors delivering specialist services

3. Policies Relating to Modern Slavery

The following policies support Acorn's commitment to eliminating modern slavery and human trafficking:

- **Whistleblowing Policy** – Provides safe reporting routes for concerns relating to Acorn or its supply chains
- **Employee Code of Conduct** – Sets standards of professional and ethical behaviour
- **Core Values** – Reinforce expected behaviours across the organisation
- **Procurement Policy** – Requires suppliers to uphold high ethical standards and ensures those failing to comply may have contracts terminated
- **Safeguarding Policy** – Ensures employees can recognise and report exploitation, protecting vulnerable adults and learners
- **Recruitment and Selection Policy** – Specifies strict identity, right-to-work, reference and DBS checks

4. Due Diligence

Acorn Training undertakes due diligence to prevent modern slavery within its operations and supply chain. Measures include:

- A supplier approval process assessing ethical standards, working conditions and compliance with relevant UK labour legislation
- Use of reputable recruitment agencies only
- Verification of right-to-work, identity, DBS results and qualifications for all employees
- Documented evidence maintained on personnel files

The organisation will not engage with any business knowingly involved in slavery or human trafficking.

5. Risk Assessment and Management

While the risk of direct infringement within Acorn's workforce is low due to UK legislation and internal controls, we recognise increased risk in areas such as:

- IT and hardware supply chains
- Estates, cleaning and maintenance services
- Recruitment supply chains
- Subcontracted delivery partners

Acorn continues to review supplier risks and applies additional scrutiny where heightened risk indicators are identified.

6. Training and Awareness

Acorn Training is committed to ensuring its workforce understands:

- The signs of modern slavery and human trafficking
- Reporting routes and whistleblowing protections
- Supplier and subcontractor obligations
- Responsibilities linked to working with vulnerable learners and justice participants

Training is embedded through induction, safeguarding training and updates to long-serving staff.

7. Measuring Effectiveness (KPIs for 2026–2027)

To assess the effectiveness of steps taken, Acorn Training will implement the following KPIs during the 2026–2027 financial year:

- 100% of new suppliers to complete enhanced due-diligence checks
- 100% staff completion of annual safeguarding and modern slavery training
- Quarterly supply chain risk monitoring through procurement
- Annual review of all recruitment agency compliance
- Zero tolerance breaches identified within Acorn's direct operations

8. Future Commitments (2027 Improvement Plan)

During 2027, Acorn Training will:

- Introduce tiered supply chain risk categorisation
- Strengthen subcontractor due-diligence monitoring
- Publish updated supplier ethical standards
- Update modern slavery awareness training for frontline staff
- Expand audit sampling for high-risk supply categories

9. Approval

This statement has been approved by the Executive Management Team and is published in accordance with Section 54 of the Modern Slavery Act 2015. It will be reviewed annually before its expiry.

Signed:

A handwritten signature in blue ink, appearing to read 'Franzen', is written over a light blue horizontal line.

Sophia Franzen

Chief Operating Officer

Date: **March 2026**