


<b>Responsibility:</b>	Managing Director	<b>Date doc. created:</b>	March 2022
<b>Print name sign off:</b>	Simon Little, Managing Director	<b>Last review date of doc:</b>	March 2022
<b>Signature:</b>		<b>Next review date:</b>	February 2023

# Modern Slavery and Human Trafficking Statement

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 November 2021.

Best Practice Network ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Best Practice Network has one centralized office based at: Best Practice Network, Newminster House, 27-29 Baldwin St, Bristol, BS1 1LT.

## Organisational structure

Best Practice Network is a wholly owned subsidiary of Supporting Education Group operating in the education sector.

The nature of our supply chains is as follows: We work with several key direct suppliers, who provide us with goods, such as equipment for our premises, and services, such as outsourced business processes, IT software and marketing services.

For more information about the Company, please visit our website: <https://www.bestpracticenet.co.uk>

## Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

## Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation 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, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in England and in many cases exceeds those minimums in relation to its employees].

The Organisation concludes that the COVID-19 pandemic did/did not adjust the risk of modern slavery to a level above that which existed before the pandemic.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

## Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

1. **Recruitment and selection policy** - We conduct checks on all prospective employees and associates to verify that they are eligible to work in the UK. We require a Disclosure and Barring Service (DBS) check for all employees and associates as they may be working with vulnerable people and children.
2. **Whistleblowing policy** - We operate this policy so that employees can raise concerns about how staff are being treated or practices within our business or supply chains without fear of reprisal
3. **Safeguarding policy** - This policy highlights draws attention to this statement.

We make sure our suppliers are aware of all our policies and are alerted to updated policies via our website and adhere to the same standards.

## Due Diligence

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures including internal supplier audits:

1. Identify and action potential risks in our business and supply chains.
2. Monitor potential risks in our business and supply chains
3. Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
4. Provide protection for whistleblowers.

## Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because much of our supply chain is based in the UK and in low-risk industries, such as internet software and services.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers or if suppliers in our supply chain do not implement anti-slavery policies in high-risk scenarios, we will seek to terminate our relationship with that supplier immediately.

## Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

We will train our staff about modern slavery issues and increase awareness within the Company.

## Training our staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company
- What external help is available

## Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding the Organisation's obligations.

Their contact details are as follows:

<b>Slavery Compliance Officer</b>	Tracy Clement
<b>Email Address</b>	<a href="mailto:tracyclement@bestpracticenet.co.uk">tracyclement@bestpracticenet.co.uk</a>
<b>Phone number</b>	0117 4503675
	07469 143 998

## Next steps

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

Timetable for staff training with annual updates