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## NFER Modern Slavery Statement

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**April 2025**

## Introduction

NFER acknowledges that under the Modern Slavery Act 2015, it is not required to produce an annual modern slavery statement, but does so in recognition of its responsibilities in taking a robust approach against slavery and human trafficking.

This statement sets out the steps that NFER has taken and is continuing to take to ensure modern slavery or human trafficking is not taking place within our business or supply chain.

We are committed to the highest levels of quality and service and to being a trusted supplier, partner and advisor. NFER is, therefore, working to ensure we have effective systems and controls in place to safeguard against any form of modern slavery within the business or our supply chain.

## What is Modern Slavery?

The Modern Slavery Act 2015 (MSA) was introduced by the UK government as a way of tackling modern slavery in this country and to lead the way internationally in cracking down on this crime.

UK businesses are seen to have a role to play in tackling modern slavery, and the legislation ensures that they must not knowingly or unknowingly be complicit in this type of crime.

The production of an annual modern slavery statement allows organisations to demonstrate what action they have taken to prevent modern slavery within their businesses and supply chains. They are encouraged to go beyond their legal obligations and recognise they have a social responsibility also, which in turn benefits their business. Those benefits include:

- Staff retention and loyalty
- Stakeholder confidence
- Stronger and stable supply chains
- Protecting customers
- Supporting and protecting reputation and brand.

### Definition of Modern Slavery

The charity Anti-Slavery International defines modern slavery as being when an individual is exploited by others, for personal or commercial gain.

Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.

### Forms of Modern Slavery

Modern slavery is a broad term for a range of exploitation types, including:

- Human trafficking
- Forced labour
- Debt bondage/bonded labour
- Child slavery
- Forced and early marriage
- Domestic servitude
- Sexual exploitation
- Criminal exploitation

## Our Organisation

NFER is a not-for-profit organisation and registered charity. We are a leading independent provider of research, assessments and related services for education, training and children's services. Our clients include government departments and agencies at international, national and local levels. They call upon NFER's range of expertise and professional services to help them develop and deliver education policy and practice.

NFER's purpose is to provide robust, independent research and assessment services which improve education, particularly for school-aged children and young people.

This is underpinned by our values: **Collaborative, Can before Can't, Outcome focused and Acting with integrity.**

Our values support and guide our work and shape our culture. They enable NFER to hold itself accountable, focus on what is most important, and recognise our social responsibility.



NFER employs over 220 staff, including more than 90 research staff and 40 specialist research operations staff. Our teams are mainly based in our head office in Slough, but we also have an office in York. We engage with nearly 1000 associates and temporary workers; they provide professional services in our research teams, but also support our assessment services.



NFER works in the UK and internationally. Our work outside the UK is predominantly in Sub-Saharan Africa, including Kenya, Uganda, Rwanda, Ghana, and Australia.

## Our Policies

We are committed to carrying out our work in an ethical and lawful way, which is underpinned by integrity and professionalism. NFER understands its responsibilities toward safeguarding and is committed to ensuring there is no modern slavery or human trafficking in the Foundation or in our supply chains.

Our values, policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and help govern our approach to safeguarding, human rights and modern slavery. They also provide systems and controls to minimise the risk of modern slavery in our business and wider supply chain.

We operate the following policies:

#### **Whistleblowing Policy**

We encourage all our staff, workers, customers and business partners to report any concerns related to NFER activities or our supply chain. Our whistleblowing procedure is designed to make it easy to make disclosures without fear of retaliation.

#### **Personal Security Checks Policy**

All our staff and workers are required to undertake pre-employment screening checks and ongoing security checks under the Disclosure and Barring Service. This is to maintain the safety and security of children when our staff undertake activities within schools, to maintain NFER's integrity, safety and security, as well as to guard against the employment of anyone posing as a prospective employee for commercial or personal gain. This policy also covers the requirement for employment references to be provided.

#### **Anti-Bribery & Corruption Policy**

Our policy sets out to provide guidance on what is and what is not acceptable and what constitutes bribery and corruption, and it sets standards to prevent any such cases throughout the Foundation.

#### **Code of Practice**

This sets out the principles and practices that affect the assessment, evaluation, information, research, delivery, and product development work carried out by NFER in the UK and internationally. It is issued to all staff, associates, temporary workers and subcontractors to ensure they operate within NFER guidelines.

#### **Research Governance Framework**

The framework is a set of policies, procedures and standards of good practice through which NFER ensures the integrity and quality of our research. It sets out who is accountable for the decisions NFER make and the actions we take that affect our research integrity and quality.

#### **Complaints Policy and Procedure**

Provides a route for complaints to be brought to NFER where someone may not be happy with how the Foundation has conducted its business or where they feel NFER has fallen short of the level of service they would expect.

#### **Code of Conduct**

The code outlines the minimum standard of behaviour NFER expects from its associate workforce. More than one version of the code is available, depending on the work the associate worker undertakes.

#### **Child Protection Protocol**

The protocol provides guidance to all staff who come into direct contact with children and/or deal with their data. It informs staff of what steps to take should safeguarding concerns arise from our work and how to report them. It also details clearly our Safeguarding Lead and Deputy Safeguarding Officer.

#### **Working with Schools Policy**

The policy sets out how NFER approaches working with schools. It outlines how we communicate and interact with them, conduct our research in schools and manage confidential information, and provides ethical guidelines and rules for data protection.

Work is underway to strengthen NFER's approach to safeguarding, including preparing a new safeguarding policy and providing refresher training.

## Due Diligence and Risk Assessment

We regularly review the risks our supply chain can present, and whilst we consider our exposure to modern slavery to be extremely low and unlikely, we expect our suppliers and contractors to have a zero-tolerance approach to exploitation.

To this end, our due diligence and reviews include:

- The expectation that all those in our supply chain and our contractors have values similar to NFER.
- Modern slavery contract clauses are within our terms and conditions for our supplier contracts.
- Where appropriate, working with an external provider to support the procurement and evaluation process of new UK suppliers.
- Adherence to our international procurement policy and evaluation process for all overseas suppliers.

While NFER is comfortable that its approach to due diligence, its assessment of risk and its processes ensure slavery and/or human trafficking is not taking place within the organisation or supply chain, we will continually look for ways to strengthen our approach.

## Measurement

In measuring our effectiveness, NFER is committed to reviewing all policies annually and more frequently if required. We are continuing to work on the development of our due diligence processes and reporting to prevent modern slavery and human trafficking from taking place in our business and supply chains.

## Statement Approval

This statement was approved on 1 April 2025 by **Carole Willis, NFER, Chief Executive Officer**.