



ANTI-SLAVERY STATEMENT

FINANCIAL YEAR: 2018/19

Statement author: **Clerk to the Corporation**

Approved by: **Activate Learning Corporation**

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INTRODUCTION

Activate Learning fully supports the principles set out in the Modern Slavery Act 2015, including the protection of internationally proclaimed human rights. In line with these principles, Activate Learning:

- respects the rights of workers to join, form or not to join workers organisations including trades unions
- is committed to ensuring that it is not complicit in human rights abuses
- does not use forced or compulsory labour
- complies with minimum age laws and does not employ child labour
- is dedicated to maintaining workplaces that are free from discrimination or harassment based on any characteristic protected by applicable law
- provides employees with a safe and healthy workplace
- is committed to promoting environmental responsibility and encourages the development and application of environmentally friendly technologies
- prohibits corruption in all its forms, including extortion and bribery
- believes that freedom of expression is a fundamental human right.

Activate Learning is a Further Education Corporation, registered under the Further and Higher Education Act (1992) on 01 April 2003, as Oxford and Cherwell College. The Corporation was renamed Oxford and Cherwell Valley College on 17 August 2005, and Activate Learning on 01 September 2013. Activate Learning is a leading provider of secondary, further and higher education, based in Oxfordshire, Berkshire and Surrey. The Activate Learning group comprises seven further education colleges, seven schools, an apprenticeship provider and an international division.

During the 2018/19 financial year, Activate Learning merged with Bracknell & Wokingham College and the Guildford College Group, in 'type 2' mergers completed in January 2019 and March 2019 respectively.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

Activate Learning provides high quality education services in the South East of England. Activate Learning Corporation is overseen by the Board of Governors, who are responsible for the strategic leadership and oversight of the group. Activate Learning has three wholly owned subsidiaries: Activate Enterprise Ltd., Merrist Wood Enterprises Ltd. and Activate Learning Investments Ltd. The Activate Learning schools are managed by the Activate Learning Education Trust, of which Activate Learning is a Member.

The majority of Activate Learning's activity is conducted within the UK, excluding some international partnerships whereby we provide approval and validation of professional and academic programmes in Malaysia, Myanmar, Vietnam, Indonesia, China, India, Azerbaijan, Armenia and Malta, and arrange educational visits to the UK for students from Asia, Africa, Central Asia, Europe, Scandinavia, South America, Pacific Islands, West Indies, and Russia. Activate Learning Investments Ltd. is the sole shareholder of The Oxford Partnership, which manages four colleges for women in Saudi Arabia.

Activate Learning's supply chain covers staffing resources and operational activities, with main areas including but not limited to: estates management, agency staffing, transport, IT resources, printing and learning resources.

ANTI-SLAVERY INITIATIVES

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of Activate Learning supply chain, Activate Learning will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review. To enable these processes to work effectively, it is essential to engage with our suppliers in order to:

- Communicate our modern slavery statement and strategy to suppliers to ensure that they understand its importance to the organisation, the role they will play in it and our expectation that they will co-operate to achieve its delivery; and
- Work collaboratively with suppliers to determine the level of risk of modern slavery within the supply chain and how these risks can be mitigated.

We will recognise that there is increased risk of modern slavery in certain countries, including those in which some of our International partners operate. In order to ensure that our partners understand and concur with our commitment to prevent modern slavery, we will ask all International partners to sign a declaration confirming their commitment and any anti-slavery measures in place.

We will mitigate the risk of modern slavery and human trafficking for its own staff by following fair HR recruitment and selection policies and procedures. Where recruitment agencies are used, we require that such agencies comply with all UK legislation relating to employment rights and welfare of candidates.

Through our Public Interests Disclosure Policy, we will ensure that staff are aware of the process for reporting concerns related to modern slavery, and the Governance Team are responsible for investigating and responding to any disclosures.

RELEVANT POLICIES

The following Activate Learning policies detail practices and procedures which reduce the risk of modern slavery in our organisation and supply chains:

- Procurement Strategy / Procurement Guide
- Safer Recruitment Policy
- Public Interests Disclosure Policy
- Safeguarding Policy
- Gender Policy
- Employee Code of Conduct
- Contractor Code of Conduct

DUE DILIGENCE PROCESSES

New Suppliers and New Contracts

Procurement will use the competitive tender process to communicate Activate Learning's anti-slavery policy and strategy to bidders. Procurement will include clauses in tender documents that require suppliers to acknowledge our commitment to eliminating modern slavery.

For the supply of goods and services, Procurement actively promote the use of public sector frameworks as the suppliers have already undergone stringent and detailed due diligence processes to ensure they are not involved in modern slavery or any other illegal activity.

Procurement undertakes appropriate financial and due diligence checks when considering taking on a new supplier and as part of that process, will request that any new suppliers (with a turnover exceeding £36m) provide a copy of their Modern Slavery statement.

Existing Suppliers and Existing Contracts

Over the coming year, Activate Learning will identify industry areas within our supply base in which there may be a higher risk of modern slavery occurring. The Procurement team will set a grading policy with which to risk assess existing suppliers in these areas using additional information gathered by means of a questionnaire.

Suppliers who are assessed as high risk will be requested to provide a due diligence report on their supply chain annually for the length of their contract to evidence that they have taken action to mitigate the risk of slavery in the supply chain.

Suppliers who fail to take action to mitigate the identified risks within its supply chain will be removed from the organisations list and contracts will not be renewed.

Procurement will continually monitor and risk assess the supply base, determining risk factors, setting a grading policy, and requesting action from suppliers to mitigate identified risks.

International Partners

As part of the new partnership process, all new International partners will be asked to sign a Modern Slavery Declaration; this will be managed and monitored by the International Division.

Employee due diligence

We conduct thorough identity and right to work checks and ensure that all employees are paid at least the legal minimum wage.

PERFORMANCE REVIEW

We will measure performance against these initiatives to ensure continual improvements in our efforts to ensure that Activate Learning continues to respect the rights and freedoms of those it works with. These measurements will include collection of supplier Modern Slavery Statements or acknowledgements of Activate Learning's commitment to anti-slavery policies, International partner Modern Slavery Declarations, staff training and identity and right to work checks for employees.

STAFF TRAINING

All employees of Activate Learning are required to undergo face to face Safeguarding training on a tri-annual basis. As this training includes recognising modern-slavery risk factors and how to respond, all staff are briefed to recognise the warning signs of modern slavery and trafficking, particularly in respect of our students. Further training specific to modern slavery is being developed and will be rolled out over the 2019/2020 year.