
Report author: **Director of Governance**

Approved by: **Activate Learning Corporation**

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INTRODUCTION

In September 2019, the Director of Governance met with representatives of the HR and Procurement functions and the International Division, to review Activate Learning's Modern Slavery Statement and set objectives for improving our compliance with the Modern Slavery Act 2015. This report outlines our progress against those objectives and our objectives for the 2020/21 year, outlined in the attached Modern Slavery Statement.

The Group Executive Team are asked to note the progress against the 2019/20 objectives and approve the 2019/20 Modern Slavery Statement for recommendation to the Activate Learning Corporation.

ANTI-SLAVERY INITIATIVES 2019/20 – PROGRESS UPDATE

During the 2019/20 year we committed to a number of initiatives to identify and mitigate the risks of modern slavery occurring in any part of Activate Learning supply chain. We set out to strengthen our due diligence processes to ensure that they are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These initiatives and processes are subject to on-going assessment and review.

Supplier Due Diligence

New Suppliers and New Contracts

During 2019/20, we committed to the following initiatives to strengthen our new supplier due diligence:

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

It has not been possible to update tender documents with relevant clauses this year; however, our on-boarding process for new suppliers ensures their commitment to eliminating modern slavery.

- Actively promote the use of public sector frameworks for the supply of goods and services 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.

We are confident that all frameworks we use for procurement of goods and services have robust due diligence processes around modern slavery. 6 procurement processes were completed using these frameworks.

- Request that, as part of our financial and due diligence checks, any new suppliers (with a turnover exceeding £36m) provide a copy of their Modern Slavery statement.

We have embedded this check into our new supplier processes and have obtained copies of Modern Slavery statements from >90% of our new suppliers with a known turnover exceeding £36m.

Existing Suppliers and Existing Contracts

During 2019/20, we committed to the following initiatives to strengthen our existing supplier due diligence:

- Identify industry areas within our supply base in which there may be a higher risk of modern slavery occurring. We 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.

It has not been possible to establish a grading process to risk assess existing suppliers this year. However, following the introduction of a new finance system, we have the tools to embed modern slavery as a facet of existing supplier risk assessment.

International Partner Due Diligence

We 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 committed to asking all new 2019/20 International partners to sign a Modern Slavery Declaration confirming their commitment and any anti-slavery measures in place.

Unfortunately, many of our International partnerships have been put on hold as a result of the COVID-19 pandemic. As a result, we have not been able to establish the Modern Slavery Declaration in the new partner process.

Employee Due Diligence

We conduct thorough identity and right to work checks and ensure that all employees are payed at least the legal minimum wage. We continue to mitigate the risk of modern slavery and human trafficking for our own staff by following fair HR recruitment and selection policies and procedures.

We continue to monitor compliance with recruitment processes and checks through regular checks of our Single Central Register. We conduct monthly audits on this Register, and identified and maintained an average compliance level of over 97%.

Where recruitment agencies are used, we require that such agencies comply with all UK legislation relating to employment rights and welfare of candidates.

We are reviewing our current supplier arrangements for agencies with whom we have established relationships with, and have confirmed that they comply with relevant UK legislation.

Staff Training and Awareness

During 2019/20, we reviewed our Corporate Ethics Policy (which replaces our Public Interests Disclosure Policy) and established a new Whistleblowing Procedure which outlines the process for reporting concerns. The Policy and Procedure have been promoted to staff via the Staff Portal.

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.

During the COVID-19 pandemic, it has not been possible to deliver face to face Safeguarding training, however, this has been replaced with an online training module, which includes recognising modern-slavery risk factors.

During 2019/20 we committed to developing and rolling out further training specific to modern slavery.

It has not been possible to roll out specific modern slavery training during the 2019/20 year, but this is being developed and will be rolled out during the Autumn Term of 2020 using the Learning and Development SharePoint site and an online module.