
Statement author: **Director of Governance**

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.

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 two wholly owned subsidiaries: Activate Enterprise 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, Brazil, Argentina, Kazakhstan, Zimbabwe, Kenya, South Africa, Philippines, 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.

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
- Corporate Ethics Policy
- Whistleblowing Procedure
- Safeguarding Policy
- Employee Code of Conduct
- Contractor Code of Conduct

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.

During the year, we successfully embedded modern slavery checks into our new supplier process, and confirmed our compliance with employment rights and welfare requirements through monthly HR compliance audits. We conducted a wider review of our employment agency suppliers and within this, confirmed their compliance with the relevant legislation. We reviewed and promoted our Whistleblowing Procedure and launched a new Corporate Ethics Policy and staff portal site, and continued to deliver mandatory safeguarding training (including information about modern slavery) online during the COVID-19 pandemic.

We were not able to update our tender process and existing supplier risk assessment process, or introduce staff training specific to modern slavery, however we have updated our systems to better support these initiatives in the coming year. Due to the COVID-19 pandemic, many of our International partnerships have been put on hold and we have therefore not been able to embed updates to the new partner process.

ANTI-SLAVERY INITIATIVES 2020/21

In order to continue to build upon our progress in the 2019/20 year to improve our due diligence processes and identify and mitigate the risks of modern slavery occurring in any part of Activate Learning supply chain, we are committed to the following initiatives during the 2020/21 year.

Supplier Due Diligence

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.

New Suppliers and New Contracts

During 2020/21, we commit to strengthening our new supplier due diligence by:

- Continuing to 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 will ensure that public sector

frameworks are utilised during 20/21 where they are deemed the most appropriate method of procuring the goods and services; and

- Requesting that, as part of our financial and due diligence checks, any new suppliers with a turnover of £1m - £35m complete a Modern Slavery Declaration (in lieu of provision of a Modern Slavery Statement) confirming their commitment and any anti-slavery measures in place. Through this initiative, we aim for 90% of our new suppliers to have provided either a Modern Slavery Statement or a Modern Slavery Declaration where it is applicable.

Existing Suppliers and Existing Contracts

During 2020/21, we commit to strengthening our existing supplier due diligence by:

- Utilising our new finance system to identify industry areas within our supply base are at higher risk of modern slavery occurring;
- Requesting that suppliers who are assessed as high risk 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; and
- Removing suppliers who fail to take action to mitigate the identified risks within its supply chain from the approved supplier list.

International Partner Due Diligence

During 2020/21, we commit to improving our due diligence for International partners by:

- developing modern slavery contract clauses for use in all large International partnership agreements; and
- asking all new International partners who are not subject to those clauses to sign a Modern Slavery Declaration confirming their commitment and any anti-slavery measures in place.

Employee Due Diligence

During 2020/21, we commit to ensuring that no modern slavery practices occur within our workforce by:

- Continuing to: follow fair HR recruitment and selection policies and procedures; conduct thorough identity and right to work checks; and ensure that all employees are paid at least the legal minimum wage; and
- Ensuring that all recruitment agencies we use comply with all UK legislation relating to employment rights and welfare of candidates; we will do this by requiring all new [and existing] recruitment agencies to either provide a copy of their Modern Slavery Statement (if they have one) or sign a Modern Slavery Declaration confirming their commitment and any anti-slavery measures in place.

Staff Training and Awareness

During 2020/21, we commit to raising staff understanding and awareness of modern slavery issues by:

- Introducing training specific to modern slavery for all staff, to compliment and build upon existing training within compulsory Safeguarding Training; and
- Raising awareness of modern slavery issues through the publication of a Corporate Ethics video on the Staff Portal.

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. We will report on progress against these initiatives