



TITLE	REF [as per register]	VERSION
Anti-Slavery Statement	ST002	5.0
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Corporation	12 December 2023	12 December 2025
LEAD PERSON	Governance Professional.	

# ANTI-SLAVERY STATEMENT

## 1. Organisation Structure and Supply Chain

1.1 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.

1.2 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.

## 2. Organisation Structure and Supply Chain

2.1 Activate Learning provides high quality education services in the Southeast of England. The 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.

2.3 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.

## 3. Principal Risk

3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our college services, the college will adopt due diligence processes that are proportionate to any risk areas identified. The principal risks we have identified are:

- Trading with a contractor or sub-contractor using slavery/forced labour including human trafficking or child labour and/or where workplace conditions such as working hours and health and safety are inadequate.
- Not having clear and well-communicated policies and procedures for concerns to be raised and addressed.
- Failure to fulfil statutory and moral responsibilities in the safeguarding of students which includes modern slavery.
- Training and staff awareness throughout the college.
- Employee recruitment and the use of recruitment agencies.

## 4. Due Diligence

### Supply Chain Due Diligence

4.1 Activate Learning has a responsible procurement plan to better understand and manage the risks. present within our supply chain and to ensure that we are spending in a responsible and compliant way. This looks at various facets within corporate social responsibility (CSR), with particular focus on sustainability, diversity and inclusion, modern slavery, and community.

4.2 All new suppliers are required to complete a 'New Supplier Registration' form which requires them to complete our Modern Slavery Declaration (in lieu of a provision of their own Modern Slavery Statement), confirming their commitment and any anti-slavery measures in place.

4.3 We promote the use of public sector frameworks across our organisation for the supply of goods and services, as the suppliers have already undergone stringent and detailed due diligence processes to ensure that they are not involved in modern slavery or any other illegal activities.

4.4 Our finance system supports us to identify the industry areas within our supply base which have a higher risk of modern slavery occurring. As part of our Responsible Procurement Plan, we collaboratively work with key suppliers to determine their level of CSR and risk.

4.5 Activate Learning will not work with any supplier that does not comply with the Modern Slavery Act 2015 or the College's own policies and procedures in relation to modern slavery.

4.6 In 2023/24, we plan to rank our existing suppliers based on spend, risk and the nature of work to identify a core group of suppliers that we can target with a CSR questionnaire. The questionnaire will cover specific questions around sustainability impact, Net Zero target, their own supply chain visibility, responsible owners for modern slavery etc. The CSR questionnaire will provide a valuable insight into our existing suppliers and provide an opportunity to engage with and assess their behaviours and approach towards CSR. The intention is to score the supplier responses based on their quality of answers and engagement with us, to develop a clear picture of the position of our key suppliers. Using a scoring system will allow us to monitor improvements over time.

In addition, we aim to use our finance system to automate the removal of suppliers with no spend in two years. This will allow us to remove suppliers who are no longer being used and reduce the risk of using suppliers who have not been checked or approved for a long time. If a supplier needs to be reactivated, they would be required to submit up to date company information and confirm their commitment to CSR. By reducing the number of suppliers, the risks within our supply chain will reduce.

### Employee Due Diligence

- 4.7 Activate Learning has implemented robust recruitment and onboarding processes to ensure that no modern slavery practices occur within our workforce. These processes include following fair HR recruitment and selection policies and procedures; conducting thorough identity and right to work checks; and ensuring that all employees are paid at least the legal minimum wage.
- 4.8 Our Recruitment Team uses an approved supplier list of recruitment agencies who have been checked to ensure that they comply with all UK legislation relating to employment rights and the welfare of candidates. All of the recruitment agencies we use have either provided a copy of their modern slavery statement or have signed a modern slavery declaration to confirm their commitment and any anti-slavery measures they have in place. The same checks will be conducted for any new recruitment agencies which we may work with in the future.

## 5. Staff Training and Awareness

5.1 Activate Learning has a 'Safeguarding Essentials at Activate Learning programme' which includes information about modern slavery. This training is mandatory for all employees and can be reported on to ensure compliance. In addition, we have an online Modern Slavery training module which is available in our corporate ethics suite of modules within our Knowledge and Skills Hub.

5.2 All safeguarding policies, procedures and associated collateral have been updated to include information about child criminal and sexual exploitation. Additional training sessions have been provided on the issue of criminal exploitation.

5.3 In 2023/24 we aim to encourage all staff to complete the additional online Modern Slavery model and we will introduce a corporate ethics page on our Staff Portal to further raise awareness of modern slavery and other corporate responsibilities.

## 6. Policies and Procedures

6.1 Activate Learning has the following policies and procedures in place which reduce the risk of modern slavery in our organisation and supply chains:

- Responsible Procurement Plan
- Safer Recruitment Policy
- Corporate Ethics Policy
- Whistleblowing Procedure
- Safeguarding Policy

6.2 Policies and procedures are tracked and monitored by our central Compliance Team to ensure that they are reviewed, published, and communicated to staff in accordance with the organisation's Policy and Procedure Development Framework. In 2023/24, we aim to introduce a spot check system to monitor the compliance of our essential policies and procedures across the organisation.

## 7. Performance review

7.1 This statement and our progress against our 23/24 initiatives will be reviewed on an annual basis to ensure continual improvements are made at Activate Learning.