



| TITLE | REF [as per register] | VERSION |
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| Anti-Slavery Statement | ST002 | 5.0 |
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| LEAD PERSON | Governance Professional. | |

ANTI-SLAVERY STATEMENT AND HUMAN TRAFFICKING STATEMENT

1. Introduction

1.1 Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse or vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory behaviour or facilitating their travel with the intention of exploiting them soon after.

1.2 Human trafficking involves the recruitment or movement of people, by the use of threat, force, fraud, or the abuse of vulnerability, for exploitation.

1.3 Activate Learning is committed to preventing modern slavery and human trafficking across our organisation and supply chains. We operate a zero-tolerance approach to any form of exploitation and are dedicated to promoting safe, fair and respectful working conditions in everything we do. As an education provider, we recognise the importance of strong ethical standards and robust safeguarding practices. We understand that modern slavery can occur in any sector and remain vigilant in identifying and managing risks within our operations and procurement activities.

1.4 This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It outlines the steps we are taking to strengthen our due diligence, supplier oversight, staff training, and policies. We are committed to continuous improvement and to ensuring that modern slavery has no place within our organisation or the services we rely on.

2. Organisational Structure

- 2.1 Activate Learning is a pioneering education group committed to transforming lives through our learning philosophy and extraordinary mindset. We operate eight Further Education (FE) college campuses across Surrey, Berkshire and Oxfordshire as well as delivering apprenticeships, higher education, and online courses locally, regionally, and nationally. We reach over 20,000 learners annually, through providing secondary, further and higher education, apprenticeship, community learning and business training opportunities for individuals from 14 – 85, supporting a lifelong approach to learning.
- 2.2 The group also includes two wholly owned subsidiaries, Activate Enterprise Ltd and Activate Learning Investments Ltd and is a sponsor and member of Activate Learning Education Trust (ALET).
- 2.3 Activate Learning (the Corporation) is a Further Education Corporation established on 1st April 2003 under the provisions of the Further and Higher Education Act 1992. The Corporation is an exempt charity under Part 3 of the Charities Act 2011 and is regulated by the Secretary of State for Education as Principal Regulator for all Further Education Corporations in England. The members of the Corporation Board, are trustees of the charity.
- 2.4 It is the Corporation's responsibility to bring independent judgement to bear on issues of strategy, performance, resources, compliance and standards of conduct. The Corporation Board is responsible for approving this Modern Slavery Statement and monitoring progress against our commitments.

3. Principles

Modern Slavery Act 2015.

- 3.1 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.

Principal Risks

3.2 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'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.

4.2 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.

4.3 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.

4.4 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.

4.5 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.

4.6 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.

4.7 In 2025/26, 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.

4.8 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

4.9 We have robust recruitment and onboarding processes designed to prevent modern slavery within our workforce. These include:

- Fair recruitment and selection policies
- Thorough identity and right-to-work checks
- Ensuring all employees are paid at least the legal minimum wage

4.10 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.

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 We have a corporate ethics page on our Staff Portal to further raise awareness of modern slavery and other corporate responsibilities which we aim to refresh in 2025/26.

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
- Recruitment and Selection Policy
- Corporate Ethics Policy
- Whistleblowing Procedure
- Safeguarding and Prevent 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.

7. Performance review

7.1 Activate Learning monitors the effectiveness of its approach to preventing modern slavery through regular reviews of policies, safeguarding arrangements and reporting, staff training completion, and supplier due-diligence processes. Findings are used to inform continuous improvement. We review this statement and progress against our commitments annually to ensure continuous improvement in identifying, preventing and addressing modern slavery risks across the organisation.

