

## **Modern slavery and human trafficking statement**

### **Introduction**

This statement sets out the actions taken by Luminate Education Group (the group) to understand all potential modern slavery risks related to its business and the steps taken by the group aimed at ensuring that there is no slavery or human trafficking in its own business or supply chains. This statement relates to the group's actions and activities during the financial year ending July 2023 to meet the requirements of Section 54 of the Modern Slavery Act 2015.

As a professional, responsible, and ethical education group, the group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We have a zero-tolerance approach to any form of non-ethical practices. The group is committed to acting ethically and preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

The group has an annual turnover in excess of the statutory minimum threshold of £36m and therefore has a statutory obligation to publish a 'Modern Slavery and Human Trafficking Statement'.

Luminate Education Group is one of the UK's largest FE and HE establishments, offering a diverse curriculum to its students.

The supply chain structure for the group has the following categories of spend: estates, capital works, IT, professional services, recruitment, marketing, catering supplies and sub-contract providers.

### **Policies in relation to slavery and human trafficking**

This statement explicitly addresses our position in relation to modern slavery and human trafficking, however it also has links to other relevant policies and procedures including the Group Financial Regulations.

### **Due diligence processes**

- Where framework agreements are used to procure goods, works or services the group works with the framework agreement operators who are undertaking risk management of modern slavery and human trafficking within their supply chains on behalf of the organisations using the framework.
- Where the group is entering into a sub-contracting arrangement with partner providers we have ensured their management and staff are aware of the objectives of the Modern Slavery Act 2015 and have appropriate safeguards in place as part of the due diligence process.
- Where a framework is not being utilised for the procurement of goods, works or services the group undertakes a risk-based approach.

### **Risk assessment and management**

The Home Office statutory guidance on modern slavery states that an organisation's approach to modern slavery should be based on assessing and managing risk.

The group is engaged in the provision of secondary, further and higher education services. The risk of human slavery and trafficking in the organisation's own business, as distinct from its supply chain, is low in view of our existing policies and procedures in relation to recruitment and safeguarding.

Risks of human slavery, trafficking and other forms of exploitation being embedded in the goods and services supplied to the group are likely to arise where:

- goods are produced, processed or transported through countries with a high risk of human exploitation e.g. eastern Asia, parts of Africa;
- other suppliers purchase or utilise goods falling into this risk category;
- UK organisations working with or supplying staff to the college follow recruitment practices which fail to manage the risk of inadvertently supporting human trafficking activities;
- where the group engages with, or collaborates with, other organisations who are not vigilant in relation to modern slavery and human trafficking.

Enquiries about businesses' understanding of the Modern Slavery Act 2015 are embedded within the business questionnaires used for supplier appraisal within tenders for the supply of goods and services valued over £10k, except where framework agreements are used. All suppliers with a turnover in excess of the £36m threshold must provide us with their statement; for suppliers below that threshold we ask that they comply. Where appropriate information is not provided, this would be pursued and if necessary any failure to provide modern slavery information on the part of a business with turnover in excess of the statutory threshold would act as a bar to contract award.

### **Key performance indicators to measure the effectiveness of the steps taken**

The group intends to create performance indicators to monitor the effectiveness of steps being taken; these will include:

- professional procurement staff undertake and complete the Chartered Institute of Procurement & Supply (CIPS) e-learning module "Ethical Procurement and Supply" on a regular basis;
- continually review existing supply contracts with a value greater than £25k procured outside of a framework with emphasis on those highlighted as a higher risk.

### **Training on modern slavery and trafficking**

The group has several staff who are members of CIPS. CIPS have a wide range of e-learning modules available for members including Ethical Procurement and Supply which we will encourage staff to complete.

No internal training is currently planned, however, over the next 12 months the group will take steps to review its training programmes and what internal training is required for group staff on issues related to modern slavery and human trafficking.

### **The future**

As a public sector organisation the group recognise the responsibility we have to embed social value into our business activities. This includes working towards eradicating modern slavery and human trafficking in our business and supply chains. We remain committed to this and will continue to make further improvements.

This statement has been approved by the Senior Leadership Team and the Group Board of Governors.



Dr Shaid Mahmood MBE  
Chair of the Board of Governors  
28 April 2023