

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



Policy Group: People

Effective: June 2024

Approved: Louise Clough, Director of People

Responsible Officer: Caitlin McPherson, People & Culture Coordinator

Next Renew Date: June 2025

Ref no: 1.15



GUIDANCE

Vision

Transform lives through learning

Values



PASSIONATE - We are passionate about inspiring young people, adults and our Purple People to be their best and we take pride in creating a positive learning environment to fulfil their potential.



UNSTOPPABLE - We are unstoppable in our quest for the pursuit of excellence. We are dedicated and resilient to develop ourselves and our learners.



RIGHT - We treat each other with respect and strive to do the right thing through insight, inclusion, honesty, growth and trustworthiness.



PARTNERSHIPS - We support the people surrounding us in our everyday lives, building effective partnerships with businesses, learners and all stakeholders where we can pass on our knowledge and skills to help them meet their goals.



LEARNERS - Learners are at the centre of everything we do and we are driven to provide life-changing and life-long learning for them.



EMPOWERED - We encourage our Purple People to be independent and autonomous to maximise their goals surpassing their barriers and targets. Feel it, believe it, live it.

Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of Amendments
23/04/2020	4	Addition of LHAA
09/06/2022	3	Addition of Code of Conduct in Relevant Policies
09/06/2022	5	Addition of CIPS registered employees
26/07/2023	All	Annual Review
26/07/2024	All	Annual Review. Addition of Due Diligence undertaken on supply chain.

INTRODUCTION

Learning Curve Group (LCG) is one of the largest national training providers in the UK, providing education and training nationally. All companies within the LCG family uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

Learning Curve Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. LCG understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

LCG does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to LCG in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. LCG strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Applies to

This statement applies to all operations and employees within LCG.

STATEMENT

This statement sets out Learning Curve Groups' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the Education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that any supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Learning Curve Group:

Learning Curve Group is a national training and education specialist working with further education providers, employers, and learners to help them achieve success.

Since 2004, Learning Curve Group (LCG) has grown both organically and through acquisition to become one of the largest and most diverse providers in the country.

LCG works with businesses throughout the UK, supporting impactful training and skills strategies that help them meet core organisational objectives such as performance and output.

These include the provision of short-term vocational qualifications to longer-term apprenticeships, including the best way to utilise the Apprenticeship Levy, LCG helps over 4,500 employers every year with their workplace training plans. With a number of different models, from short to long term, and access to over £40m of adult skills funding, our offer is attractive to a range of sectors.

Countries of Operation and Supply

LCG currently operates in the following countries:

United Kingdom - Directly funded by the Education Skills Funding Agency, LCG is the largest subcontractor partner to FE colleges of our type, meaning we help deliver over £20m of skills funding per year. This includes an extensive portfolio of services that supports FE providers to reach their targets and allows us to help over 100,000 learners a year achieve a nationally recognised qualification. LCG are the largest publisher of specialist FE materials at levels two and three, and we create truly ground-breaking online and paper distance learning resources that support people to learn new skills to advance their careers.

We offer our courses on a commercial basis within other countries (e.g. Botswana, Malaysia) but we do not use any supply chain in these countries and work directly with vetted organisations.

High-Risk Activities

Given the robust UK legislative framework, the risk of infringement for our employees and supplier employees working in our UK sites is low. Nevertheless, we recognise our responsibility to identify and address potential infringements linked to the goods and/or services we procure. Therefore, we have

put in place procedures to work to ensure that our suppliers adhere to the same standards as we apply to ourselves.

Responsibility

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

Relevant Policies

The organisation operates the following policies/procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing Policy - The organisation encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete the LCG Whistleblowing report form.

Employee Code of Conduct - This sets out expectations and principles for what the Learning Curve Group considers to be appropriate workplace behaviour.

Learning Curve Group Values - Our values make clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating across the UK and managing its supply chain.

Procurement Policy – We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with our suppliers to ensure that they meet the highest standards of ethics and improve their worker's working conditions. However, serious violations of these standards will lead to the termination of the business relationship.

Recruitment Policy - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

LCG use a government certified identification services provider (IDSP) to ensure that all employees can evidence their right to work in the UK and their identity. Those who are not UK Citizens must follow our Identity checks process and provide the correct evidence. Evidence must be as prescribed by UK Visas and Immigration and the Disclosure and Barring Service.

An offer of appointment to any successful candidate is conditional upon:

- Receipt of written references, covering the last 5 years of employment, confirmed by telephone where possible
- Verification of the candidate's identity
- A basic, standard, or enhanced Disclosure and Barring Service check, depending on role, which includes a check of the Barred Lists, including an overseas 'Certificate of Good Conduct' or equivalent
- Evidence of permission to work for those who are not UK citizens.
- Verification of the candidate's medical fitness through a health questionnaire
- Verification of qualifications

All checks will be:

- Documented and retained on the personnel file (subject to restrictions on the retention of information imposed by Disclosure and Barring Service regulations)
- Followed up where they are unsatisfactory or where there are discrepancies in the information provided

Corporate Social Responsibility

Our Social Values Group, attended by employees from across the business, meet regularly to consider how we best support communities, individuals and charities. LCG has established their own Charity Foundation which allows employees to raise money for multiple charities / organisations who can apply to the foundation for support. We ensure that our values are anchored to our social value and that all activities and initiatives have value add both to the business and to the community.

Due Diligence

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process reviews the controls undertaken by the supplier to ensure they comply with our Procurement Policy and that they act ethically and within the law.

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- mapping the supply chain to assess a particular product or geographical risks of modern slavery and human trafficking. This is done each year and if any suppliers are identified as being outside of the UK, a specific assessment is undertaken to ensure we understand the risk of modern slavery/trafficking and, if necessary, implement measures to mitigate the risks
- evaluating the modern slavery and human trafficking risks of each new supplier by carrying out a thorough evaluation of all new suppliers, reviewing the supplier location, sector and upstream supply chain activities
- terms are incorporated into our supplier contract that allows us to invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

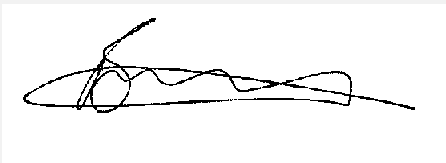
Additional procedures ensure that this statement is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Company activities.

Our Head of Procurement is a member of the Chartered Institute of Procurement and Supply (CIPS) and as such adhere to their Corporate Code of Conduct. Our procurement processes support and comply with a commitment to reinforcing ethical values across all our procurement and supply practices, which includes modern slavery and human trafficking, in line with CIPS' Code of ethics. Knowledge is refreshed and updated as part of ongoing CPD.

Board Approval

This statement was approved on 26 July 2024 by Learning Curve Group's board members, who review and update it annually.

Designated member's signature:

A handwritten signature in black ink, appearing to be 'Brenda McLeish', written on a white rectangular background.

Designated member's name:
Brenda McLeish OBE DL

Date: 26/7/24

DEFINITIONS

The organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement