

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Agreed by the Board of Luminate Education Group on 16 December 2019.

Our Commitment

Luminate Education Group is committed to ensuring that slavery and human trafficking have no place in our business or our supply chain.

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

Purchasing Policy

The Group's Purchasing Policy states that the group incorporates social, economic and environmental considerations into supplier and product selection and purchasing processes and that we ensure that we comply with all statutory and organisational requirements applicable to purchasing. Our commitment to ensuring that we do not purchase goods and services affected by human slavery, trafficking or other forms of exploitation is encompassed within this policy statement.

Assessing and Managing Risk

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 college 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.

A further reputational risk to the group is where the group engages with, or collaborates with, other organisations who are not vigilant in relation to modern slavery and human trafficking.

Where the group forms part of the training and organisational development supply chain for commercial customers with a turnover in excess of £36m, such customers may also be expected to ask the group about our procedures and take the response into account when determining whether to engage with the group for their training and organisational development requirements.

Actions taken during financial year 2018/19

1. The risk assessment process previously developed remains in place and has been applied in relation to the supply of low value goods known to originate from eastern Asia or be assembled from items which originate from eastern Asia, such as stationery and identity cards/related items. Suppliers of goods such as these have been asked to confirm they have procedures which identify modern slavery risk and ensure suppliers have appropriate safeguards in place.
2. Where the colleges can exercise the greatest influence over other organisations, we have ensured their management and staff are aware of the objectives of the Modern Slavery Act 2015 and have appropriate safeguards in place. In particular, this has been done by including enquiries about understanding of the Modern Slavery Act 2015 within the partner providers' due diligence process.
3. 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 £20,000, except where framework agreements are used. 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.
4. Where framework agreements are used, the college works with the framework agreement operators (such as the Crescent Purchasing Consortium) who are undertaking these enquiries on behalf of the education sector.
5. A number of major suppliers who are paid more than £50,000 per year have been contacted requesting details of the steps they are taking to ensure that slavery and human trafficking is not taking place within their businesses and supply chains and requesting copies of any relevant policy documents dealing with this issue. The Financial Resources team engaged a college student undertaking work experience who contacted the college's main suppliers in order to obtain copies of their Modern Slavery statements or locate them on their websites. A database of Modern Slavery and Human Trafficking Statements from around 30 of our main suppliers has been collated as a result.
6. West Yorkshire Police have carried out several talks and sessions on identifying and reporting on modern slavery during staff development sessions during the year.

This statement has been approved by the Executive Leadership Team and will be reviewed annually by the group.

This statement has been approved by the Leeds City College Corporation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our college's slavery and human trafficking statement for the academic year ending 31st July 2019.

Dr Shaid Mahmood
Chair of the Board of Governors