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LTE Group Modern Slavery and Human Trafficking Statement 2025-26

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INTRODUCTION

This statement sets out the actions taken by LTE Group to understand modern slavery risks related to its business and the steps taken by the Group aimed at ensuring that slavery, servitude, forced or compulsory labour and human trafficking are not taking place in its own business or supply chains. This statement relates to the Group's actions and activities during the financial year ending July 2026 and is prepared to meet the requirements of Section 54 of the Modern Slavery Act 2015, taking account of the Home Office's updated Transparency in Supply Chains statutory guidance and current public procurement requirements.

LTE Group recognise that modern slavery is a significant global human rights issue and includes human trafficking. Our commitment is reflected throughout our values which are the key ideas and principals that people within our organisation and partners believe are important and they define the way we work. The Group is committed to combatting modern slavery and human trafficking and to acting with integrity in all its relationships.

The Group will continue to monitor legislative and regulatory developments, including proposed changes to the Modern Slavery Act 2015 which, if enacted, may introduce more prescriptive reporting requirements, statutory publication deadlines, accuracy declarations, reporting obligations for certain public authorities and financial penalties for non-compliance. The Group will update this statement and its supporting processes as required once any such changes come into force.

OUR STRUCTURE

LTE Group is an exempt charity and a statutory corporation in receipt of public funds for the delivery of education and training under the regulation of the Secretary of State for Education. This statement covers LTE Group, its trading divisions, subsidiaries and joint ventures (including but not limited to The Manchester College, UCEN Manchester, Novus, MOL, Total People Ltd, LTE Professional Services Ltd, Novus Gower Ltd, Novus Transforming Lives and Novus Cambria Ltd).

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OUR BUSINESS
The Manchester College delivers further education delivery, UCEN Manchester higher Education delivery, Novus delivers learning and skills in custodial settings, Total People delivers work based learning and MOL blended distance learning.

OUR SUPPLY CHAIN
We buy products and services from suppliers across UK, Europe and worldwide. Some are for re-sale and others we use in our own businesses for the provision of education.

Our procurement function is responsible for sourcing the goods and services we need to run our businesses.

We buy from approximately 1130 suppliers across 5 categories: Education & Learning, Property & Facilities, HR & Professional Services, Technology and Marketing. In 2024/25, we spent over £45M, mainly through our top 390 managed suppliers. Our largest spend categories are Estates, IT, TMC and Group which account for approximately 55% of our total spend. Spend > £300k per supplier is concentrated in 27 suppliers.

IDENTIFIED RISKS AND STEPS BEING TAKEN
The Group has assessed its risk as low and identified the following areas of processing activities that may attract risk associated with modern day slavery and human trafficking:

- in its supply chains
- through the use of agency or temporary staff
- through staff recruitment
- students

Supply Chains
LTE Group expects high standards from its suppliers and partners.

Through its Procurement Policy LTE Group ensures that all purchasing is based on good practice and meets its strategic objective to embed sound ethical, social and environmental policies within LTE Group's procurement function and to comply with all relevant legislation in all aspects of purchasing.

LTE Group has adopted a corporately managed and co-ordinated approach to procurement including developing robust supplier and selection mechanisms to produce quality service providers, using modern procurement practices including strategic partnering contracts, sharing services and consortium working. Crescent Purchasing Consortia, Government Commercial Agency and other such Associations who are responsible for co-ordinating procurement contract negotiations, assisting in Tendering, maintaining supplier lists, and to ensuring compliance with all relevant purchasing legislation. Procurement activities are undertaken with regard to the Procurement Act 2023, the associated exclusions and debarment regime, the Central Digital Platform and current public procurement guidance on tackling modern slavery in government supply chains.

The LTE Group is dedicated to procuring goods, works and services for its operating divisions without causing harm to others. In doing so, the Group is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights. The Group procures a significant amount of goods, works and services through national and sector frameworks. These frameworks, and LTE Group's own tendering processes where used, are expected to consider relevant exclusion grounds, supplier declarations, supply chain assurance

and modern slavery risk, particularly where goods may be sourced from overseas manufacturers or sectors where forced labour and other forms of modern slavery are known to be more prevalent.

For those suppliers that fall into higher-risk areas, these will be asked to commit to the ETI Base Code of the Ethical Trading Initiative (ETI). The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

To ensure compliance with the requirements of the Modern Slavery Act in the procurement of goods and Services, LTE Group has implemented A Supplier Code of Conduct which our suppliers and supply chain are required to comply with. This is attached as an appendix to this statement.

Where relevant to the nature, value and risk profile of a procurement, suppliers may be required to confirm whether they are within scope of Section 54 of the Modern Slavery Act 2015, provide a copy of or link to their latest modern slavery statement, confirm the accuracy of information submitted through procurement processes, and provide evidence of proportionate controls for managing modern slavery risks in their own operations and supply chains.

All purchases are subject to the LTE Group Official Purchasing Terms and Conditions. Under the Procurement Act 2023, certain modern slavery offences may constitute mandatory exclusion grounds, and evidence of modern slavery risk or misconduct may be relevant to discretionary exclusion, supplier self-cleaning, contract management and debarment considerations. LTE Group will apply these requirements proportionately and in accordance with applicable procurement law and guidance.

Employment of Staff Through Recruitment Agencies and Other Sources

The Group recognises that a further high-risk area of modern slavery is the use of temporary staff recruited indirectly by the Group through supply agencies or recruitment agencies. When the Group requires the services of temporary staff, these staff are only sourced through established and accredited companies and expect the provider to demonstrate compliance with applicable employment legislation, including right-to-work requirements, national minimum wage/national living wage obligations, working time requirements and responsible recruitment practices. The Group may request evidence of compliance as part of onboarding, contract management or periodic supplier assurance activity.

Direct Employment of Staff

Although the Group recognises that the risk level is lower in respect of the direct recruitment of staff, there are robust policies and procedures in place to support Safer Recruitment in Education. The Group believes that this reduces the minimal risk of the occurrence of modern slavery by strict adherence to the Group's recruitment and selection policies and procedures. In addition, the Group has a whistleblowing policy through which concerns of any wrongdoing or malpractice can be raised.

HR plays a key role in reducing the risk of modern slavery through the Group's recruitment, onboarding and employment practices. This includes ensuring appropriate right-to-work, identity, qualification, safer recruitment and pre-employment checks are completed.

Students
The Group has in place clear safeguarding policies and processes through which students can obtain assistance, support and advice on any concerns raised that may pose a risk to their wellbeing and also has strong external relationships with the statutory services available to minimise risk.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING
We keep under review our colleague policies, procurement supplier and supply chain policies and processes, to ensure that they reflect best practice and support our objectives in this area. Our requirements are set out clearly in all of our documentation including the attached Supplier Code of Conduct and Modern Slavery is referenced in the following documents issued to suppliers and the following policies:

Supplier and Supply Chain Policies:
- Doing Business with LTE Group
- LTE Group Generic Terms and Conditions
- Procurement Policy - section 19 Modern Slavery
- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Counter-Fraud Policy and Fraud Response Plan

Colleague Policies
- Safeguarding Policies
- Whistleblowing Policy
- Safe and Fair Recruitment Policy
- Voluntary Workers Policy
- ED&I Policy

DUE DILIGENCE PROCESSES
As well as the regular review of all policies which reference modern slavery and human trafficking, LTE Group undertakes the following processes to fulfil our commitments:

- Where a contract or framework agreement is being used to procure goods, works or services the Group works with the contractor/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 based on the size and scale of the organisation, with due diligence conducted as required to identify and assess potential modern slavery risks in our supply chains.
    - For higher-risk procurements, the Group may use proportionate modern slavery risk assessment questions, supplier declarations, contract clauses, requests for evidence, contract management discussions and escalation routes to understand and mitigate risk throughout the commercial lifecycle.

- A combination of procedures and functions operates to help identify, assess, and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chain.
    - Where concerns are identified, the Group will consider appropriate remediation and escalation action, taking account of the need to avoid action that could cause further harm to workers or potential victims, and will seek advice where required.

Measuring Effectiveness and Implementing Performance Indicators

To measure our impact this year we will:

1. Supplier Engagement: Continue to review our approach to maintain our understanding of areas of risk across our supply chain and continue to seek to identify opportunities to foster collaboration and shared learning with our Top Suppliers on modern slavery risks and challenges.
2. Training and Awareness: Continue to log the number of employees accessing modern slavery training/awareness materials.
3. Investigations: Continue to record the number of incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations
4. Ensure maintenance of knowledge through professional procurement staff completing the Chartered Institute of Procurement & Supply (CIPS) e-learning module "Ethical Procurement and Supply" on a regular basis.
5. Reporting and Governance: Review the statement against the updated Home Office Transparency in Supply Chains guidance, including the recommended reporting areas of organisational structure and supply chains, policies, risk assessment and management, due diligence, training, monitoring and evaluation.
6. Procurement Compliance: Continue to consider modern slavery risk in relevant procurement activity, including supplier declarations, exclusion grounds, contract conditions and contract management processes under the Procurement Act 2023 and current public procurement guidance.
7. HR Compliance: Monitor completion of right-to-work, identity, qualification, safer recruitment and pre-employment checks through recruitment and onboarding processes, with any exceptions escalated and addressed in accordance with relevant Group policies.

TRAINING AND CAPACITY BUILDING ON MODERN SLAVERY AND HUMAN TRAFFICKING

Training has been delivered through mandatory training to all colleagues. The Modern Slavery module for all colleagues is delivered on a 3 year cycle.

The Modern Supply Chain module designed for the supply chain, is also delivered on a 3 year cycle and is issued to a more unique group of people, to those people that use the Finance portal (Unit4) - ie people that do indeed deal with the supply chain.

Both modules are next due for release in 2028, subject to earlier release if required by legislation, statutory guidance, material changes in risk, or updates to LTE Group's procurement or safeguarding arrangements.

Overall responsibility for modern slavery sits with our Board, and our Modern Slavery Statement is signed off by our Group Chair. This statement will be reviewed annually by the Group Board

Signed:

Philip Johnson, Group Board Chair
Dated 23rd October 2026

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APPENDIX: SUPPLIER CODE OF CONDUCT

LTE Group endeavours to engage with suppliers, sub-contractors and strategic partners who treat their workers with dignity and respect, adhere to applicable laws and regulations, and provide their goods, works or services in an environmentally sustainable manner. It is the organisation's policy to request our Supply Chain to respect the principles of our Supplier Code of Conduct and adopt practices which comply with it. LTE Group expects suppliers, subcontractors and strategic partners to maintain proportionate controls to prevent, identify and respond to modern slavery risks within their own operations and supply chains, and to provide evidence of those controls where reasonably requested. LTE Group expects our suppliers, subcontractors and strategic partners to undertake to commit to the following requirements:

Employment Practices

To comply with all employment laws applicable to its business.

- Must not use child labour which prevents children from complying with compulsory schooling or training, being harmful to their health or development. • Must make no use of forced or compulsory labour.
- Must comply with national law and regulations regarding working hours, wages, benefits and written employment conditions.
- Must not discriminate unlawfully in its employment decisions based on: age, disability, race (including colour, nationality, ethnic group), religion or belief, sex, sexual orientation, trans gender, pregnancy or maternity, marriage or civil partnership, trade union membership or political affiliation.
- Shall not treat its workers in an inhumane or harsh way including harassment, bullying, physical or verbal abuse or other forms of intimidation.
- Must notify its employees of the applicable supplier code of conduct.
- Must comply with applicable modern slavery, human trafficking, labour rights, right to work, wage, working time, health and safety and equality legislation, and must not knowingly engage suppliers or subcontractors that use forced labour, child labour, debt bondage, human trafficking or other forms of exploitation.
- Must notify LTE Group promptly where they become aware of any actual or suspected modern slavery issue connected with goods, works or services supplied to LTE Group and must cooperate with any reasonable investigation, remediation or contract management action.

Environmental

- All waste materials and production by-products should be disposed of properly and in an environmentally responsible manner.
- All local laws and regulations must be met and operations conducted in a manner that conserves resources.
- LTE Group expects our Supply Chain to [share/demonstrate] its commitment to protecting the environment and to actively identify, manage and monitor the environmental impacts associated with their operations and activities.
- Suppliers should take appropriate steps to reduce their environmental impact, including, where relevant, through the responsible management of energy and resource use, emissions, waste and other environmental impacts.
- LTE Group encourages initiatives and continuous improvement measures that to reduce the impact on the environment, particularly through the use of environmentally friendly technologies processes and working practices.
- LTE Group's Supply Chain comply with applicable local and international environmental regulations and standards.
- LTE Group's Supply Chain should be able to demonstrate appropriate arrangements for managing and monitoring their environmental performance which may include and environmental management system, certified to a recognised standard such as ISO 14001 or EMAS certified.

Health and Safety

- Employers must provide a safe and healthy work environment.
- Fire prevention equipment must be readily accessible, and employers are responsible for conducting suitable fire safety, prevention and evacuation training.
- There must be adequate Welfare Facilities including sanitary conveniences, washing facilities and drinking water. These facilities must be accessible to all employees including those with disabilities.
- Suppliers must have appropriate emergency preparedness and response arrangements in place and ensure that relevant employees are aware of these arrangements.
- Suppliers must undertake appropriate health and safety risk assessments, implement suitable control measures and review these arrangements as necessary.
- Suppliers must ensure that employees receive appropriate health and safety information, instruction and training relevant to their roles and working environment.
- Suppliers must have appropriate arrangements for recording, investigating and, where relevant, reporting significant health and safety incidents, and for taking corrective action to reduce the risk of recurrence.
- LTE Group's Supply Chain should be able to demonstrate appropriate arrangements for managing and monitoring health and safety performance, which may include a health and safety management system certified to a recognised standard, such as ISO 45001 or EMAS certified.

Ethics and Integrity

- LTE Group's Supply Chain must not offer or give, any gift or consideration of any kind as an inducement or reward for doing or refraining from doing or for having done or refrained from doing, any act in relation to the obtaining of any contract with LTE Group, or for showing or refraining from showing favour or disfavour to any person in relation to the Contract or any such other.

- LTE Group's Supply Chain must comply with all anti-bribery, anti-corruption, fraud, tax evasion, competition, modern slavery and public procurement laws applicable to their business, including the Bribery Act 2010, the Modern Slavery Act 2015 and applicable requirements under the Procurement Act 2023.

LTE Group reserves the right to request details of how its Supply Chain complies with this Supplier Code of Conduct and expects the application of principles of the Code with their Supply Chains.

	Name:	Postion:	Signature
Approver:	Philip Johnson	LTE Group Board Chair	