

Statement on Modern Slavery 22/23

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INTRODUCTION

This statement sets out the actions taken by LTE 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.

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.

OUR STRUCTURE

We are 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).

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 1349 suppliers across 5 categories: Education & Learning, Property & Facilities, HR & Professional Services, Technology and Marketing. In 2022/23, we spent over £57M, mainly through our top 430 managed suppliers. Our largest spend category is Estates, which accounts for approximately 14% of our total spend. Spend > £300k per supplier is concentrated in 35 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. LTE Group work with purchasing consortia such as Crescent Purchasing Consortia, Crown Commercial Services 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.

The LTE Group is dedicated to procuring goods, works and services for its operating divisions without causing harm to others. In so doing, The LTE Group is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights. The LTE Group procures a large amount of goods, works and services from National Frameworks, who will as part of European Tendering Legislation, have undertaken enquiries and evaluations into the wide range of products that are supplied, many of which are sourced from overseas manufacturers who operate in low-cost countries where modern forms of slavery are 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.

All purchases are subject to the LTE Group Official Purchasing Terms and Conditions.

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 who can provide the Group with assurance that they comply with the requirements of the legislation.

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.

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 – page 6
- LTE Group Generic Terms and Conditions – section 16
- Procurement Policy
- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy

Colleague Policies

- Safeguarding policies
- Whistleblowing Policy
- Recruitment Policy
- Voluntary workers policy
- ED&I Policy
- Eligibility to work in UK

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.
- 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.

Measuring Effectiveness and Implementing Performance Indicators

To measure our impact this year we will:

1. Supplier Engagement: review our approach to further improve our understanding of areas of risk across our supply chain and seek to identify opportunities to foster collaboration and shared learning with our Top Suppliers on modern slavery risks and challenges.
2. Training and Awareness: Log the number of employees accessing modern slavery training/awareness materials.
3. Investigations: Record the number of incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations.

TRAINING AND CAPACITY BUILDING ON MODERN SLAVERY AND HUMAN TRAFFICKING

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.

NEXT STEPS

In addition to continuing our approach as outlined above, to measure our impact this year we will:

1. Supplier Engagement: review our approach to further improve our understanding of areas of risk across our supply chain and seek to identify opportunities to foster collaboration and shared learning with our Top Suppliers on modern slavery risks and challenges.
2. Training and Awareness: Log the number of employees accessing modern slavery training/awareness materials.
3. Investigations: Record the number of incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations.
4. Professional procurement staff will undertake and complete the Chartered Institute of Procurement & Supply (CIPS) e-learning module “Ethical Procurement and Supply” on a regular basis.

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 Chair

Dated: 30th October 2023

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 organisations 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 expect our suppliers, sub-contractors and strategic partners 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.

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 expect our Supply Chain to share our commitment to a clean and safe environment.
- LTE Group encourage initiatives to reduce the impact on the environment, particularly through the use of environmentally-friendly technologies.
- LTE Group's Supply Chain shall agree to respect local and international environmental regulations and standards.
- LTE Group's Supply Chain shall be able to prove the effective implementation of the following requirements: The existence of an environmental management system, possibly ISO 14001 or EMAS certified.

Health and Safety

- Employers must provide a safe and healthy work environment.

- Fire prevention equipment must be accessible (in factory and dormitory facilities), and employers are responsible for conducting fire prevention and evacuation training.
- Dormitory housing should provide clean and adequate space for employees with sanitary facilities and water supply.
- Restrooms should be clean and available for all employees.
- The supplier must have a plan for emergencies.

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 and anti-corruption laws applicable to our business, including the Bribery Act 2010 and the Prevention of Corruption Act 1889 to 1916.

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.