

Policy Statement on Modern Slavery

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LTE Group

Policy on Modern Slavery

Scope

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, and Novus Cambria Ltd).

Context

As 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, LTE Group is both fully committed to and compliant with the requirements of the Modern Slavery Act 2015.

Intent

LTE Group operates with the highest degree of probity and compliance, particularly in the employment of staff. It requires its subcontractors and partners to operate to the same degree of compliance.

Reporting

As required by legislation the statutory corporation will include an annual statement on anti-slavery and how the organisation has complied with the Modern Slavery Act. This will be published as part of its Annual Financial Statements.

Responsibility

The prevention, detection and reporting of modern slavery in any part of the Group is the responsibility of all colleagues or those working on the Group's behalf. Colleagues will not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the requirements of the Modern Slavery Act 2015.

LTE Group expects the same high standards from its suppliers and partners. A Supplier Code of Conduct has been separately drafted to articulate compliance with the requirements of the Modern Slavery Act in the procurement of goods and services. This is attached as an appendix to this policy.

As a not for profit organisation in receipt of government funding LTE Group it at limited risk of breach of the Act. Nevertheless, a risk-based approach is taken to the Group's contracting processes and these processes are kept under review. Contracts entered into by the Group are expected to make appropriate reference to the requirements of the Modern Slavery Act 2015.

Should any breach of the requirements of the Act come to the attention of LTE Group this will be considered sufficient to trigger an investigation under the Group Public Interest Disclosure Policy.

Audit & Risk Committee

June 2021

Appendix

LTE Group

Slavery and Human Trafficking Statement

Supplier Code of Conduct

Slavery and Human Trafficking Statement

Introduction

LTE Group is dedicated to procuring goods, works and services for its operating divisions without causing harm to others. In so doing, LTE Group is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our suppliers, clients, students, staff, strategic partners and the public about LTE Group and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its Supply Chains.

LTE Group considers that its spend through its supply agreements warrants a statement on the risks inherent in our Supply Chains and the steps we are taking to address them, in line with LTE Group's pioneering practices in sustainable and responsible procurement.

LTE Group procures a large amount of goods, works and services from National Frameworks, who will 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 [Base Code](#) of the [Ethical Trading Initiative](#) (ETI) and LTE Group will be working to encourage all suppliers in these areas to support these initiatives. 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.

Our Plans for the Future

LTE Group expresses its commitment to better understand its Supply Chains and work towards greater transparency and responsibility towards people working within them.

For contracts that LTE Group have awarded, we will identify those Supply Chains which represent a medium-to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, clients, students, staff, strategic partners and the public, we will closely monitor those Supply Chains that have been identified as a potential risk and take appropriate action if necessary.

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.