

MODERN SLAVERY AND HUMAN TRAFFIC STATEMENT

Policy Group: HR

Effective: 01 May 2019

Approved: Gail Crossman, Director of
Performance and Development

Responsible officer: Louise Clough, Director of
People / Daniel Delacoe-Eyre, HRBP

Next renew due: 01 May 2020

Ref no.: 1.17

GUIDANCE

Values | Vision | Tone of Voice



Vision

Transforming lives through learning

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 getting to understand them. We are caring and supportive, as well as being determined and strive 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

I. INTRODUCTION

Learning Curve Group is one of the largest national training providers in the UK, providing education and training nationally. In October 2018 Profound Services Limited and Northern Care Training Limited joined the Learning Curve Group family. This policy has been adapted by the Group and is to be adhered to by all employees all learners, employers, and members of the public across the three companies.

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.

II. STATEMENT

This statement sets out Learning Curve Groups's 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. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

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 £20m 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 Skills Funding Agency and Education 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 groundbreaking online and paper distance learning resources that support people to learn new skills to advance their careers.

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.

Learning Curve Group Values - Our values makes 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.

All candidates are to bring with them documentary evidence of their right to work in the UK and their identity. Evidence should be as prescribed by UK Visas and Immigration and the Disclosure and Barring Service, and can include a current driving licence or passport including a photograph, or a full birth certificate, and a document such as a utility bill or financial statement that shows the candidate's current name and address (please note that these latter two are time-limited and must be no more than 3 months old). Where appropriate, evidence should also include change of name documentation. Some form of photographic ID must be seen.

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 nationals of a European Economic Area country
- Verification of the candidate's medical fitness through a health questionnaire
- Verification of qualifications

All checks will be:

- Confirmed in writing
- 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 CSR group, attended by employees from across the business, has met regularly and continues to review our Corporate Social priorities and progress. A CSR program has been launched and governs the likes of charity activities, Better Health at Work, IIP and other initiatives for employees. This will ensure that our values are anchored to this framework 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.

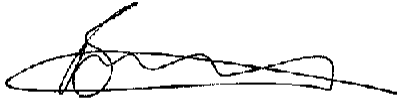
The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

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.

Board Approval

This statement was approved on 31st May 2019 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 read 'Brenda McLeish', written over a horizontal line.

Designated member's name: **Brenda McLeish**

Date: 31.05.19

III. 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.