

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the EKC Group's slavery and human trafficking statement for the financial year ending 2018.
- 1.2 The EKC Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Group is taking (and intends to take) to avoid the risk of modern slavery occurring within Group's services.

2. Organisational structure

- 2.1 The EKC Group is a further education provider that employs approximately 1170 staff, operating in the United Kingdom. Its core business is teaching a learner population of approximately 12,000.
- 2.2 The Group has an annual turnover of £55m.

3. Due diligence processes

- 3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of the EKC Group's services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.
- 3.2 We have systems in place to:
- Identify and assess the potential risk areas in our supply chains.
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
 - Monitor potential risk areas in our supply chains.
 - Protect whistle blowers.
- 3.3 The EKC Group identifies the following as the principal areas of potential risk:
- supply chains
 - outsourced activities
 - recruitment practices and recruitment agencies

Policy Owner: Head of Corporate Affairs

Approving Body: Policy Committee

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4. Supply chains

- 4.1 In its supply chains, the EKC Group has identified the following business areas as carrying material risks of modern slavery occurring:
- Procurement
 - Estates
 - Cleaning
 - IT and office equipment
- 4.2 When procuring any types of goods or services, the EKC Group requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.3 Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the EKC Group's own policies and procedures, will be removed from the EKC Group's list of suppliers and will not be considered for future supply to the Group unless they can demonstrate that these compliance requirements are met.
- 4.4 In terms of future steps, the EKC Group will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

5. Training

- 5.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

6. Recruitment practices

- 6.1 Temporary staff and staff recruited indirectly by the EKC Group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the Group conducts checks on such agencies before they are approved.
- 6.2 Through its recruitment processes, the EKC Group ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

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7. EKC Group policies

7.1 The EKC Group already implements the following policies, which embed good practice and provide resolution for individuals concerned about any potential instances of modern slavery in any part of Group's business. The EKC Group operates the following policies:

Grievance and Whistleblowing policies – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Staff Code of Conduct – this code sets out the actions and behaviour expected of them whilst employed by the EKC Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain

Anti-bribery and corruption policy – the EKC Group is committed to the highest standards of ethical conduct and integrity in its business activities. The Group will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf

Procurement policy – this policy reflects the EKC Group's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls such as due diligence procedures for suppliers.

Recruitment policy – this policy ensures that the EKC Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

Financial Regulations – these regulations provide the practical and ethical standards by which the EKC Group manages its financial operations. It includes a process for carrying out due diligence on new suppliers to ensure that they meet key ethical and legislative requirements.

8. Performance indicators

8.1 Where the EKC Group has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Group will consider setting and reviewing KPIs in the following contexts:

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery

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- training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action
- oversight of third party suppliers of relevant goods and services supply chains

8.2 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

8.3 This statement has been approved by the EKC Group's senior management team and will be reviewed at least once annually.

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