



Policy/Procedure/Guideline Review

Policy / Procedure / Guideline:	Modern Slavery and Human Trafficking Statement for the Financial Year: 2024-2025
Senior Leader Responsible:	Assistant Principal Finance & HR
Author:	Assistant Principal Finance and HR
Approved By:	Board of Corporation
Date Approved:	15 December 2025
Next Review Date:	15 December 2026
Publication:	Group website
Changes Made:	<p>New document:</p> <p>Under Section 54 of the Modern Slavery Act 2015, organisations carrying out business in the UK with an annual turnover of £36 million or more must publish an annual slavery and human trafficking statement. As the Group's turnover exceeds this threshold, we falls within scope of this statutory requirement.</p> <p>The purpose of the statement is to set out the steps the organisation has taken to ensure that modern slavery, servitude, forced or compulsory labour, and human trafficking are not taking place within its operations or wider supply chains. While the legislation does not mandate specific actions, it does require the organisation to be transparent about the measures it has in place and any planned improvements.</p> <p>The Board of Corporations statutory responsibilities are to:</p> <ul style="list-style-type: none">• Review and approve the Modern Slavery and Human Trafficking Statement annually.

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| | <ul style="list-style-type: none">• Ensure that the statement accurately reflects the Group's structure, supply chains and the actions it has taken during the year.• Provide oversight and strategic direction for ongoing work to strengthen controls and monitor risks.• Confirm that the statement will be made publicly available on the Group's website, as legally required. |
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The Board should note that the Group already embeds a number of protections through its **established Financial Regulations , Procurement, Safeguarding, Recruitment, Procurement and Whistleblowing frameworks**, and these contribute significantly to managing risks associated with modern slavery.

Modern Slavery and Human Trafficking Statement

For the Financial Year: 2024–2025

East Lancashire Learning Group

1. Introduction

East Lancashire Learning Group is committed to preventing modern slavery and human trafficking in all its activities and supply chains. We recognise our responsibilities under the Modern Slavery Act 2015 and adopt a zero-tolerance approach to all forms of modern slavery, servitude, forced or compulsory labour, and human trafficking.

This statement outlines the steps the College has taken during the financial year to ensure that slavery and human trafficking are not present in our organisation or wider supply chain.

2. Our Organisation

East Lancashire Learning Group is provider of Further and Higher Education, established under the Further and Higher Education Act 1992. The Group is an exempt charity for the purposes of Part 3 of the Charities Act 2011. We have two college campuses, Nelson and Colne College and Accrington and Rossendale College, located in East Lancashire and offer adult provision over a Lancashire wide footprint through Lancashire Adult Learning.

We educate approximately 16,000 learners annually and employ approximately 700 staff.

East Lancashire Learning Group has a normal annual turnover of c£38mn.

The College provides:

- Further education for 16–18-year-olds
- Adult education and community learning
- Apprenticeships and employer training
- Higher education programmes
- Specialist support for students with additional needs

We procure a wide range of goods, services, and works to support our operations, including estates and construction projects, IT equipment, course materials and subcontracted training provision.

3. Our Supply Chains

3.1 The College's supply chains include:

- ICT equipment, software, and digital services
- Estates supplies and management, construction, and building contractors
- Catering and Food suppliers
- Course consumables
- Office and general administration consumables and equipment
- Professional services (legal, financial, HR)
- Subcontracted training providers

We recognise that certain categories—such as construction, estates and building contracts and overseas manufacturing of IT equipment—pose a higher risk of modern slavery.

3.2 As part of our approach to maintaining a supply chain that is free of modern slavery, forced labour and human trafficking, staff in the group must work with our Finance Department to engage new suppliers and we have an established due diligence process and require all suppliers to sign our supplier terms and conditions.

3.3 We use Public Sector Framework Agreements wherever possible. These agreements are managed by recognised purchasing consortia who each have their own anti-slavery policies. Many Framework suppliers have signed up to the Base code of the Ethical Trading Initiative (ETI), a code of good labour practice set out by the International Labour Organisation (ILO).

3.4 We maintain the right to terminate contracts with suppliers who fail to comply with their obligations under our terms and conditions.

3.6 In terms of future steps, East Lancashire Learning 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.

4. Recruitment Practices

4.1 We maintain robust recruitment procedures that ensure:

- We follow transparent recruitment processes, including measures to prevent illegal working
- Verification of identity and right to work for all employees
- All staff are employed voluntarily and can leave employment freely
- Staff receive fair pay and appropriate terms and conditions

4.2 Employees recruited indirectly by East Lancashire Learning Group are:

- recruited through preferred, reputable recruitment agencies who have been subject to our procurement and supplier due diligence processes.
- relevant checks are conducted on those agencies before they are approved to ensure they carry out all the necessary pre-recruitment checks.

5. Safeguarding

5.1 The group is alert to the risks of exploitation affecting both young people and adults, including:

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE), including county lines
- Trafficking indicators for labour or sexual exploitation
- Forced labour within families, employment or organised groups
- Exploitation of adults with care and support needs
- Risks faced by ESOL learners, refugees or those with insecure immigration status
- Online grooming and trafficking risks

Our safeguarding procedures ensure a coordinated response to concerns about modern slavery and human trafficking. Staff are required to report any suspicion or disclosure immediately to the Safeguarding Team who will take appropriate action, which may include referrals to:

- Local Authority Children's or Adult Services
- The Police
- The National Referral Mechanism (NRM)
- Other specialist support agencies

All safeguarding staff undertake specialist training on recognising the indicators of trafficking and modern slavery.

6. Related Policies

The College has several policies that support our commitment to combat modern slavery:

- Financial Regulations and Financial Procedures
- Procurement Handbook
- Anti-Bribery Policy Statement
- Safeguarding Children and Vulnerable Adults Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Recruitment and Selection Policy
- Subcontracting and Partnership Agreements

These policies are reviewed regularly to ensure compliance with legislation and alignment with sector best practice.

7. Training and Awareness

To ensure staff can identify and report concerns:

- Procurement and HR teams receive targeted training on modern slavery risks
- Safeguarding teams undertake specialist training

8. Reporting Concerns

The College promotes an open culture where concerns can be raised safely.

- Staff, students, suppliers, and the public can report concerns via the Whistleblowing Policy
- Immediate concerns about potential modern slavery victims are handled in accordance with safeguarding procedures
- Safeguarding teams can escalate cases through referrals to relevant agencies where appropriate

All concerns are treated confidentially and investigated promptly.

9. Approval and Publication

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes East Lancashire Learning Group's modern slavery and human trafficking statement for the financial year 2024–2025.

This statement will be made available to all employees, stakeholders and the general public on the East Lancashire Learning Group website.

It was approved by the Corporation Board on 15 December 2025.

Signed for and on behalf of the East Lancashire Learning Group Board of Corporation:

A handwritten signature in black ink, reading "Phil Wilkinson". The signature is written in a cursive style with a long horizontal flourish underneath.

Phil Wilkinson

Chair

15 December 2025