Environments for Learning Limited ("the Company")

Modern Slavery Statement & Human Trafficking Statement for the financial year to 30th September 2018

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Company has taken and is continuing to take all reasonable endeavours to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Company Overview

The Company was formed to act as the Holding Company for a number of special purpose vehicle subsidiaries ("SPVs"), together the "Group", whose business is to develop contracts with local authorities to build schools, learning and leisure facilities of excellence. As at 30 September 2018 the Group has developed contracts for building and operating schools with the following clients: Sandwell Metropolitan Borough Council, Leeds City Council, St. Helens Borough Council and Plymouth City Council.

These contracts include PFI projects to:
- Design, build, finance and operate 1 school in Sandwell;
- Design, build, finance and operate 5 schools, 1 well-being centre and 2 leisure centres in Leeds;
- Design, build, finance and operate 1 school in St. Helens;
- Design, build, finance and operate 2 schools in Plymouth.

In addition, the Company has 4 design, build and operate contracts in Sandwell and several design and build contracts (D&B Contracts) for schools in Leeds, Sandwell, Plymouth and St Helens.

The Company operates a number of policies to ensure that it is conducting business in an ethical and transparent manner, including anti-bribery, Health & Safety, and Data Protection. The policies explain the manner in which we behave as an organisation and how we expect our suppliers to act.

The Company has no direct employees; however, it does have in place a Management Services Agreement with Albany SPC Services Limited ("Albany"), which provides the services of a Finance Officer, Company Secretary, General Manager and other management staff to the Company. Albany operates a robust recruitment policy, including eligibility to work in the UK, and checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Supply Chain

The Company works with key supply chain partners.

Under the PFI projects, long-term construction and facilities management subcontracts were put in place at the time when the PFI contracts were signed. Due diligence was undertaken into the financial status, operating policies and practices, including ethical, of the subcontractors prior to the subcontracts being signed, with the principal subcontractors requiring to be pre-approved by both the SPVs and our clients and to hold any required accreditations or appropriate qualifications for the services that they would deliver.

Under the PFI contracts, the principal supplier of services is Interserve Construction Limited ("ICL") who provides the construction and facilities management services throughout the life of each project. ICL also supplies construction services for the design and build elements for the D&B contracts.

The Company recognises that there is a risk of slavery and human trafficking in the construction and facilities management sectors, and therefore expects ICL to adhere to a policy of zero tolerance to slavery and human trafficking both within its own organisation and in any of its own supply chain partners who may provide services on its behalf to the PFI or D&B contracts, and has sought and received assurances and evidence of its policies and operational practices in this respect.

In addition, the Company and each PFI contract have agreements in place with Lenders to provide credit facilities; the Company believes this area of activity is very low risk in relation to slavery and human trafficking.

The Company intends to provide this statement to its key supply chain partners and to monitor their policies.
This statement will be reviewed on an annual basis.

This statement was approved by the Board of Directors on 25 March 2019.

This statement was signed on behalf of Environments for Learning Limited on 25 March 2019 by Peter Johnstone, Director.