

## MODERN SLAVERY ACT STATEMENT

### 1. Introduction

- 1.1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the College's slavery and human trafficking statement.
- 1.2. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. New College is committed to the principles of the Modern Slavery Act 2015 and to ensuring the abolition of modern slavery and human trafficking. This statement sets out the preventative steps that the College is taking (and intends to take) to minimise the potential risk of modern slavery or human trafficking occurring within its supply chains or within college services.

### 2. Organisational structure

- 2.1. The College is a further education college in the United Kingdom that employs approximately 800 staff operating across two campuses, plus a small satellite adult education centre. Its core business is to deliver education and training to a learner population of approximately 15,000.
- 2.2. The College has an annual turnover of c£40m of which approximately £17m is spent on goods and services to support the running of the College. A significant proportion of the income is generated via the engagement with subcontractor training organisations as outlined below.
- 2.3. The College directly engages with approximately 500 employers to deliver its apprenticeship programme in addition to its partnerships with local and national subcontractor training organisations.
- 2.4. The College also works closely with trade unions, namely UCU and Unison.

### 3. Risks

- 3.1. We have taken a risk-based approach and identified the following areas as representing a higher risk of modern slavery and human trafficking in the College's business and supply chains and detail below how the College mitigates these risks.
  - 3.1.1 **Catering** – our contract states that each party undertakes that it will not engage actively or passively in modern slavery/human trafficking; that the catering company has not committed an offence under the Modern Slavery Act 2015 (or notified that it is subject to an investigation) and that they undertake to comply with all applicable laws in relation to modern slavery/human trafficking.

- 3.1.2 **Cleaning** – the current contract does not contain a clause dealing with modern slavery/human trafficking. This contract expires in 2022 and future contracts will contain this clause.
- 3.1.3 **Facilities contracts/Capital building projects**– we will seek to ensure that any necessary contractual clauses regarding modern slavery/human trafficking are incorporated into all new contracts.
- 3.1.4 **Apprenticeship schemes**
- All potential apprentices are interviewed and documentation checked including previous employment and qualifications during the sign-up process. Each apprentice is allocated an Apprentice Co-ordinator to support them throughout their apprenticeship to support with wellbeing and any issues they have.
  - Apprentice attendance at College is closely monitored and the apprentice and employer are contacted immediately if an apprentice does not attend.
  - Assessors meet the apprentices and employers on a regular basis in the workplace to review progress and observe their work. Our focus is to ensure that these checks together with regular contact and accessibility to College staff seek to mitigate the risks of modern slavery/human trafficking and forced labour of apprentices.
  - Contracts with employers stipulate that all apprentices must be paid the statutory pay rate for at least 30 hours per week including college days which mitigate the risks of hardship which may lead to violation of human rights.
  - Modern slavery/human trafficking is included as a discussion topic for the apprentice and employer reviews undertaken by Assessors.
- 3.1.5 **Subcontracted training delivery programmes** - Our partner training organisation contracts outline our commitment to timely payments to avoid undue hardship which may lead to violation of human rights. Due diligence will be extended to include modern slavery/human trafficking as part of the process.
- 3.2 We require our suppliers to implement due diligence of its own suppliers, subcontractors and other participants to ensure that there is no modern slavery/human trafficking in its supply chains. We will consider removing any supplier from our database who refuses to comply with our expectations on modern slavery/human trafficking.

#### **4. Our policies on modern slavery and human trafficking**

- 4.1 The prevention, detection and reporting of modern slavery/human trafficking in any part of the College or supply chain is the shared responsibility of all those working for us, or on our behalf. Our policies (which are listed below) make it clear that workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the Modern Slavery Act (2015) and failure to adhere to these standards will be dealt with by the College with the severity required by the situation.
- 4.2 We have the same expectations of all our suppliers and employers.
- 4.3 We protect whistleblowers within our organisation and should we receive any reports or any evidence of abuses of human rights, modern slavery/human trafficking, we will do all in our

power, as is laid out in our Public Interest Disclosure (Whistleblowing) Policy to investigate and deal with any concerns.

4.4 All our policies are approved by the Principalship team who review them in line with the requirements of the appropriate underpinning legislation. The following policies and documents are relevant to the College's strategy to prevent modern slavery/human trafficking:

- Safeguarding Policy,
- Code of Conduct for Staff,
- Recruitment & Selection,
- Health & Safety,
- Equalising Opportunity Celebrating Diversity,
- Public Interest Disclosure (Whistleblowing) Policy,
- Complaints Procedure.

## **5. Due diligence processes and assessing and managing risk**

5.1 We have in place systems to:

- Identify and assess potential risk areas in our supply chains or when working with employers,
- Minimise the potential risk of modern slavery/human trafficking occurring in our supply chains or when working with employers,
- Monitor potential risk areas in our supply chains or when working with employers,
- Protect whistleblowers.

5.2 We take a risk-based approach to our contracting processes and keep these processes under review.

5.3 We will take steps to review the performance of our contractor's adherence to this statement on a regular basis and will take appropriate action if any failure in adherence is identified using our standard College policies.

5.4 Appropriate due diligence is carried out based on a risk assessment relevant to the sectors in which the college operates, the countries from which the services and goods are provided, the nature of suppliers and the complexity of the supply chains. Due diligence checks are also conducted by the College auditors to ensure due process is followed.

5.5 The College utilises a number of procurement consortiums which have made and published statements regarding modern slavery/human trafficking. The College has embedded procurement processes for its suppliers and attempts to foster long term relationships with trusted suppliers.

5.6 Temporary staff and staff recruited indirectly by the College are recruited through approved recruitment agencies and we only use reputable employment agencies.

5.7 Through its recruitment processes, the College ensures that all approved recruitment agencies conduct specific relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

5.8 Apprentices - The College undertakes a check on each employer to establish that they have an Employer Registration Number and are registered with HMRC. Assessors review each employer and the apprentice will only commence the apprenticeship with the employer once the Assessor has given approval.

5.9 Employer contracts going forward will include the following statement:

“All those involved in the apprenticeship programme whether at College or in the apprentice’s workplace, are subject to the terms of the College Modern Slavery Statement. Employers will not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this statement”.

## **6. Supplier Adherence to our values**

6.1 The College has developed contract clauses which are rolled out in its standard terms and conditions with suppliers of goods and services outlining the expectations regarding modern slavery/human trafficking.

6.2 All new contracts for goods and services over the value of 10k which are managed by our College procurement team, contain a clause dealing with modern slavery/human trafficking. Contracts in excess of 10k are managed by the Head of Procurement. All other contracts are managed directly by the budget holder.

6.3 The College has standard employer contracts stipulating that the employer will adhere to the policies and procedures of the College including the Modern Slavery Policy & Statement for subcontracted training delivery.

6.4 A modern slavery/human trafficking clause is in the College purchase order terms and conditions which are sent to all suppliers where a more in-depth contract is not in place.

## **7. Training**

7.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, it is our intention to deliver modern slavery awareness training at an appropriate level for Governors, Principalship, Apprenticeship, Partnership and Procurement teams.

## **8. Assessment of Effectiveness**

8.1 The College’s Principalship team have overall responsibility for ensuring that the College is conducting its business in a socially responsible way and the College is committed to ensuring that there are no issues of modern slavery/human trafficking within our supply chains, partners and employers.

8.2 The Principalship team are responsible for day-to-day management of these issues. The Principalship team are also responsible for ensuring that those reporting to them adhere to the

College zero tolerance approach to modern slavery/human trafficking across our whole supply chain, in partnerships and in apprentice employment.

## 9. Next steps

9.1 We recognise that our commitment to a zero-tolerance policy to modern slavery and human rights abuse is a continual journey and therefore we will continue to assess our performance against this commitment and as with all other areas of the College, we will also identify areas in which we need to improve.

9.2 Over the next 12 to 18 months we propose to:

- Ensure that all relevant groups including the Principalship team and College Governors have received up to date training to clarify their responsibilities and to equip them with the skills to identify areas of risk and the appropriate action to take.
- Continue to review the policies in place within the College and our contracts with suppliers to ensure that any new risks are identified and our practices are aligned to our legal and social responsibilities.
- Include a modern slavery/human trafficking clause to the cleaning contract at renewal in 2022.
- Increase staff awareness by making online training sessions and FAQs available on the College staff portal.
- Ensure we are conducting thorough and consistent due diligence in respect of any new or renewing suppliers which includes commitment to modern slavery/human trafficking compliance.
- Implement enhanced due diligence with our subcontractor training organisations to include modern slavery/human trafficking and these are reviewed annually.
- Train Apprentice Assessors and Co-ordinators in recognising modern slavery/human trafficking.
- Add the Modern Slavery Statement to the College policies we expect the employer and apprentice to adhere to in the employer and apprentice contracts.
- Add the following statements to apprenticeship employer contracts

“All those involved in the apprenticeship programme whether at College or in the apprentice’s workplace are subject to the terms of New College Swindon’s Modern Slavery Statement. Employers will not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this statement”.

This statement has been approved by the College’s senior management team and will be reviewed annually.

Signed by Carole Kitching  
Principal and Chief Executive Officer

13<sup>th</sup> January 2022