

Title: **Modern Slavery and Human Trafficking Statement**

Reviewed by: Laurel Penrose

Approved by: SMT

Date of next review: July 2019

Associated documents/policies: Code of Conduct
Public Interest Disclosure Whistleblowing Procedure
Grievance Procedure
Recruitment and Selection Policy and Procedure
Value for Money Policy

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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 for the academic financial year ending 31st July 2018.

1.2 This is a voluntary statement by Bath College, believing it is the correct action to take and to provide assurance to our stakeholders, partners and community.

1.3 'Modern slavery' encapsulates slavery, servitude and forced or compulsory labour; and human trafficking.

1.4 Bath College 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 College is taking (and intends to take) to avoid the risk of modern slavery occurring within college services.

2 Organisational structure

2.1 Bath College is a long established further education college situated in Bath and North East Somerset (B&NES) region.

2.2 The College's main business is to deliver education and training to students aged 14 and upwards and covers a range of technical and academic programmes.

2.3 The College employs approximately 480 staff and has an annual turnover of £20m.

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 college services, the College 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 The College has in place systems to:

- Monitor potential risk areas in our supply chain
- Protect whistle blowers.
- Identify that employees have the right to work in the UK
- Check that agency staff have the right to work in the UK
- Check that employees have a bank account in their own name into which remuneration is paid

3.3 The College identifies the following as the principal areas of potential risk:

- Supply chains for goods and services, particularly;

- ❖ IT equipment and uniforms.
- ❖ Outsourced cleaning and security services
- ❖ Recruitment agencies for temporary staff.

3.4 If we were to find evidence that one of our suppliers has failed to comply with the Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no improvement in the way their business is conducted.

4 Supply chains

4.1 In its supply chains, the College has identified the following business areas as carrying material risks of modern slavery occurring:

- IT equipment
- Clothing and uniforms
- Outsourced cleaning
- Capital construction projects
- Outsourced security services

4.2 When tendering any types of goods or services, the college requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection processes, including through contracting with suppliers from approved procurement frameworks.

4.3 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the College requires any supplier to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.

4.4 Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with the college that does not comply with the Modern Slavery Act 2015, or the college's own policies and procedures, will be removed from the college's list of suppliers and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.

4.5 In terms of future steps, the college 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 an appropriate 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 responsible for recruitment, procurement and contract management.

6 Recruitment practices

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

7 College policies

- 7.1 The College already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of college business. The college operates the following policies and procedures:
- Grievance and Whistleblowing procedures – these procedures allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
 - Professional Code of Conduct – this code sets out the actions and behaviour expected of them whilst employed by the College. The College strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
 - Value for Money policy and Financial Regulations – these documents reflect the College's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.
 - Recruitment and Selection procedure – this procedure ensures that the College follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

8 Performance indicators

- 8.1 Given our view that Bath College's exposure to modern slavery risk is limited, and the due diligence processes we have in place, and are planning, we have not implemented key performance indicators in relation to modern slavery and human trafficking during the past financial year
- 8.2 Where the College does identify a higher level of risk 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 College 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
- Assessment of third party suppliers of relevant goods and services and their supply chains.

8.3 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.

8.4 Having assessed the training needs for staff operating in different parts of the college, the College includes training on Modern Slavery within its Safeguarding and Prevent on-line training modules which all staff are required to undertake.

9 Further steps

9.1 Following a review of the effectiveness of the steps taken in the past financial year to prevent modern slavery or human trafficking occurring in our business or supply chain, we intend to take the following steps to combat slavery and human trafficking during the course of the 2018/19 financial year:

- Review policies to ensure an explicit mention of the Modern Slavery Act (MSA), slavery and human trafficking where appropriate
- Review supply chain contracts/update terms and conditions to require suppliers to comply with MSA requirements
- Risk assess suppliers – high, medium or low risk
- Train staff involved in procurement

10 General

For any general concerns regarding anti-slavery, there is a wealth of information and contact points through the following link:

<http://www.antislaverycommissioner.co.uk/resources/>

This statement has been approved by the College's Senior Management Team.

Laurel Penrose
Principal & Chief Executive