



MODERN SLAVERY STATEMENT FOR THE FINANCIAL PERIOD 2023/24

1. Introduction

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gloucestershire College's anti-slavery and human trafficking statement for the financial year ending 31 July 2024.
- 1.2 Gloucestershire College (the College) recognises that modern slavery (including human trafficking) is a significant global human rights issue and is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. The College requires its subcontractors and partners to operate to the same degree of compliance and integrity.
- 1.3 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 its supply chain and its own business.

2. Organisational structure and business

- 2.1 The College is a further education college established under the Further and Higher Education Act 1992 that employs approximately 900 staff and operates in the United Kingdom. It is an exempt charity for the purposes of the Charities Act 2011. It is a statutory corporation in receipt of public funds for the delivery of education and training under the regulation of the Secretary of State for Education. Its core business is teaching a learner population of approximately 8,000.
- 2.2 This statement covers the College and its subsidiaries.
- 2.3 The College has an annual turnover of approximately £42m of which approximately £14m is spent on goods and services to support the running of the College.
- 2.4 The Board of Governors of the College is responsible for anti-slavery and human trafficking within the College. The Principal and the Executive Team are responsible for the day-to-day management of these matters.

3. Supply chains

- 3.1 The College buys products and services from suppliers across the UK and, to a lesser extent, Europe and worldwide. Some are for re-sale and others are used in its own business for the provision of education.
- 3.2 The College's procurement function is responsible for sourcing the goods and services needed to run its businesses.
- 3.3 The College's supply chain structure has four main categories of spend: educational supplies and services, estates, IT and HR and professional services.



3.4 In 2023/24, the College spent approximately £13m, apportioned across the four main categories of spend as follows, mainly through its top 50 managed suppliers:

- Educational supplies and services 40%
- Estates 25%
- IT 17%
- HR and professional services 7%

30% of the total spend was concentrated in 10 suppliers.

4. College policies

4.1 The College implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of college business.

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

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

Whistleblowing Policy – this policy allows employees and others to raise concerns, which may include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

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

Financial Regulations – this policy reflects 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.

Child Protection and Safeguarding Policy – this policy sets out the College's commitment and approach to safeguarding students and staff, including early help and support.

EDI Policy – this policy sets out the College's commitment and approach to providing equal opportunities, celebrating diversity and creating a safe, enjoyable and challenging environment that ensures respect and inclusion is afforded to all.

5. Due diligence processes, risk identification and management

5.1 The College has assessed the risk associated with modern slavery and human trafficking in its own business as low. However, the College acknowledges that the risks may be greater in its supply chains.



5.2 As part of its initiative to identify and mitigate the risks of modern slavery occurring in any part of its services, the College adopts due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes are subject to ongoing assessment and review.

5.3 The College has in place systems to:

- identify and assess the potential risk areas in its supply chains or own business;
- mitigate the risk of slavery and human trafficking occurring in its supply chains or own business;
- monitor potential risk areas in its supply chains or own business; and
- protect whistle-blowers.

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

Recruitment of staff

When the College requires the services of temporary staff, these staff are only sourced through established and accredited companies who can provide the College with assurance that they comply with legislative requirements.

Although the College recognises that the risk level is lower in respect of the direct recruitment of staff, there are robust policies and procedures in place to support Safer Recruitment in Education. The College believes that this reduces the minimal risk of the occurrence of modern slavery by strict adherence to the College's recruitment and selection policies and procedures.

Students

The College has in place clear safeguarding policies and processes through which students can obtain assistance, support and advice on any concerns raised that may pose a risk to their wellbeing. The College also has strong external relationships with the statutory services available to minimise risk.

5.5 Through its procurement procedures, the College ensures that all purchasing is based on good practice and meets its strategic objective to embed sound ethical, social and environmental policies within the College's procurement function and to comply with all relevant legislation in all aspects of purchasing.

5.6 The College is dedicated to procuring goods, works and services without causing harm to others. In so doing, the College is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

5.7 The College has reviewed its conditions of purchase to ensure current and potential suppliers commit to responsible procurement and compliance with the Modern Slavery Act 2015.

5.8 Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the College's own policies and procedures, is removed from the College's list of suppliers or has their website blocked and is not considered for



future supply to the College unless they can demonstrate that these compliance requirements are met.

- 5.9 To ensure compliance with the requirements of the Modern Slavery Act 2015 in the tendering for goods and services, the College has implemented a Supplier Code of Conduct which its suppliers and supply chain are required to comply with.
- 5.10 The College works with purchasing consortia such as Crescent Purchasing Consortium, Pelican Buying Group, The Energy Consortium, Crown Commercial Service, Southern Universities Purchasing Consortium, and other such associations that help the College to comply with all relevant purchasing legislation. National Frameworks will, as part of European Tendering Legislation, have undertaken enquiries and evaluations into the wide range of products that are supplied, many of which are sourced from overseas manufacturers who operate in low-cost countries where modern forms of slavery are prevalent.
- 5.11 The College has integrated modern slavery into its Conditions of Purchase. New suppliers are required to:
- comply with the Modern Slavery Act 2015 and all other applicable laws regarding anti-slavery and human trafficking;
 - perform due diligence on their supply chains and include anti-slavery and human trafficking provisions in their supply contracts; and
 - notify the College of any breaches and provide the College with compliance reports on request.
- 5.12 Any breach of the supplier's obligations under the Modern Slavery Act 2015 is deemed a material breach of the contract. In the event of a breach, the College reserves the right to:
- terminate the contract with immediate effect;
 - require the supplier to take remedial actions to address the breach; and
 - report the breach to the relevant authorities.

6. Measuring effectiveness and implementing performance indicators

- 6.1 Where the College 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 College will consider setting and reviewing KPIs in the context of the number of:
- concerns raised and the use of the Whistleblowing Policy to raise concerns about instances of modern slavery.
 - employees reading the Code of Conduct, including references to modern slavery.
 - breaches of compliance within the College's supply chain.
 - incidents and investigations conducted into reported cases of modern slavery, including internal and external investigations.

7. Training and awareness

- 7.1 All staff are made aware of the risks of modern slavery and human trafficking as part of mandatory safeguarding training during induction and every two years thereafter.
- 7.2 This statement is available to all staff members, stakeholders and the general public by publication on the College's website.

This statement has been approved by the College's Board of Governors and is reviewed annually.



Chair of the Board of Governors