



## Anti-Slavery and Human Trafficking Statement

### 1. Introduction

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ('the Act') and constitutes the College's Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 August 2019 to 31 July 2020.

New College Durham is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. 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. We expect the same high standards from our contractors, suppliers, their supply chains and other business partners.

### 2. Organisational Structure

New College Durham, a General Further Education College, which operates in the North East of England, providing education and training to students. The College employs approximately 530 full time equivalent staff. In 2019/20 the College had an annual turnover of £36 million of which approximately £12 million was spent on goods and services to support the running of the College.

### 3. Due Diligence Processes

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.

The College has in place systems to:

- Identify and assess the potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;

- Protect whistleblowers;
- Ensure full compliance with prevailing UK legislation in relation to the employment of individuals at the College.

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

- Supply chains/procurement;
- Recruitment practices and recruitment agencies;
- Lack of awareness of staff regarding their obligations under the Modern Slavery Act 2015.

#### **4. Supply Chains**

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

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, New College Durham undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations. All tenders issued by New College Durham include the request for suppliers to provide Modern Day Slavery Statements with their submissions if the supplier's annual turnover is £36 million, which is mandatory under the Act. Additionally, the College's procurement function will manage the risk of exploitation from potentially high risk items known or likely to have come from high risk countries i.e. clothing and textiles, by requesting Modern Slavery Statements from the companies from which we procure these items via purchase orders.

Any supplier or potential supplier 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.

Further work will also include an analysis of the current suppliers who meet the turnover criteria, and for these organisations a request for their Statement will be made and recorded. For suppliers who are under the threshold the College will ask for confirmation that they comply with the College's Statement.

Additionally, through the College's procurement activities, a request via our In-Tend procurement portal will be made to current suppliers with a turnover of £36 million or more, for a copy for their Modern Day Slavery Act Statement to be added to the supplier portal. Tenders since 2015 have requested this information or the College has used frameworks which have already carried out due diligence checks including modern day slavery statements ie CPC and other consortia. 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**

To ensure a high 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. We also require our business partners to provide training to their staff and suppliers and providers.

## **6. Recruitment Practices**

All staff whether permanent, temporary or supply are recruited in-line with prevailing HR policies which ensure compliance with statutory checks and to ensure transparency in the recruitment process including measures to prevent illegal working and compliance with other relevant statutory requirements. These checks are:-

- Identity (Name, Date of Birth and Address);
- Right to work in the UK;
- Possession of relevant qualifications;
- Prohibition from teaching check;
- DBS Disclosure check (including Barred Lists where this is deemed necessary);
- Overseas checks (if a potential employee has lived outside of the UK, further checks may be obtained where obtaining a DBS disclosure is not considered sufficient);
- Other checks may include obtaining certificates of good conduct from the relevant embassy or police force.

Where an individual is unable to supply key data (e.g. right to work in the UK) the College will discharge its obligation to draw such matters to the relevant UK Authority.

Any supply staff which are sourced from third party providers are required to satisfy the aforementioned statutory checks.

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

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:

### **Grievance and Public Interest Disclosure Procedure**

**(“Whistleblowing”)** – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

**Employee 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

**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.

**Procurement Policy and Supplier Terms and Conditions/Contractors Terms and Conditions** – this Policy and Terms and Conditions detail 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.

**Safeguarding Vulnerable Groups – Essential Recruitment and Selection Practice Policy, Safeguarding Young People and Adults at Risk Policy and Procedures and Staff Recruitment and Selection Policy and Guidelines** – these policies ensure that the College follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 8. Performance Indicators

Where the College has identified risks of modern slavery occurring in any part of its services, it will aim to introduce Key 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;*
- *training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action;*

- *oversight of third party suppliers of relevant goods and services supply chains.*

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, including discussion of this statement during the induction process for new employees.

Having assessed the training needs for staff operating in different parts of the College, the College will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

## **9. Continuing Actions**

We will continue to expand the reach of our training for our staff and network of representatives in how to identify modern slavery and human trafficking.

Employees and contractors are encouraged to identify and report any potential breaches of our Modern Slavery Statement.

## **10. Review and Approval of this Statement**

This Statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes New College Durham's Slavery and Human Trafficking Statement for the financial year commencing 1 August 2019 and ending 31 July 2020.

The effectiveness of this Statement will be monitored annually and reviewed in light of experience and best practice. This mechanism recognises that changes to UK legislation may prompt an earlier review of the policy.

In considering the effectiveness of this Statement, consultation will be undertaken with Trade Unions, staff and managers to assist in the review and monitoring of this policy.