

Modern Slavery and Human Trafficking Statement

Introduction

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 financial year ending 31 July 2019.

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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Coleg y Cymoedd is committed to improving its practices to combat slavery and human trafficking in its supply chains or in any part of its services.

Organisational structure

Coleg y Cymoedd is a Further Education College with sites across RCT and Caerphilly in South Wales, that employs approximately 745 staff members, teaches in the region of 10,000 students and is one of the largest procurers of services and works in the locality.

The college has an annual turnover of £41m, of which approximately £9m is spent on goods and services to support the running of the college. The college's suppliers do not change on a seasonal basis and the percentage of employees on temporary / seasonal contracts is minimal.

The Late Payment of Commercial Debts (Interest) Act 1998, which came into force on 1 November 1998, requires Colleges, in the absence of agreement to the contrary, to make payments to suppliers within 30 days of either the provision of goods or services or the date on which the invoice was received. The target set by the Treasury for payment to suppliers within 30 days is 95 per cent. During the accounting period 1 August 2018 to 31 July 2019, the college paid 95.3 per cent of its invoices within 30 days.

Policies

The College is committed to employing staff, engaging with and supporting our learners, acquiring goods, services and works for its requirements, and otherwise conducting its business without causing harm to others. It is fully committed to acting ethically and with integrity in all its business dealings and relationships. In so doing, the College supports the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights. We will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced compulsory/bonded labour or human trafficking and that they are paid in line with the national living wage.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking, with the Senior Leadership Team taking responsibility lead for overall compliance.

As part of our commitment to combating modern slavery, we have in place the following policies and

procedures:

- Anti-Bribery Policy;
- Procurement Operational Plan;
- Grievance Policy;
- Equality and Diversity Policy;
- Safeguarding – Child Protection and Vulnerable Adults Policy;
- Sustainability Policy;
- Whistleblowing Policy;
- Recruitment and Selection Policy;
- Staff Code of Conduct.

Due Diligence

The College adopts a zero tolerance approach in relation to modern slavery and human trafficking and is committed to work to address areas of higher risk or concern.

The College purchases many of its goods and services from public sector purchasing consortia. The principal consortia used by the College are:

- National Procurement Service (NPS);
- Crescent Purchasing Consortium (CPC);
- Crown Commercial Services (CCS).

These consortia are developing processes to manage supply chain risk relating to slavery and human trafficking. In addition, the consortia have published their own Slavery and Human Trafficking Statements which state how they aim to address these issues through the procurement processes that they manage.

The College is also part of Welsh Government's Strategic Spend Analysis (through Atamis), which gives us access to TISC reports, which hold a database of suppliers who have compliant Modern Slavery and Human Trafficking Statements.

Direct employment of staff

The College mitigates the risk of the occurrence of modern slavery of directly employed staff through strict adherence to the robust recruitment and selection policy implemented by the HR Department. Additionally, the College has in place a whistle blowing policy through which staff can raise concerns.

Employment of staff through recruitment agencies and other sources

Temporary staff and other staff recruited indirectly by the College are only recruited through established and accredited agencies who can provide assurance that they fully comply with the requirements of all legislation relating to the rights and welfare of their candidates and employees.

Learners

Although the risks of learners experiencing occurrences of modern slavery or human trafficking through direct contact with the College are extremely low, it is appreciated that in the communities where they reside, they may on very rare occasions be entrapped into adopting the life style of a modern slave. In order to mitigate these circumstances the College has a dedicated Welfare Team who can provide support and advice on their wellbeing, as well as signposting to relevant organisations where appropriate.

Appropriate staff members receive safeguarding training which includes issues related to modern slavery. The College also follows the recommendations in the Home Office publication *Criminal Exploitation of children and vulnerable adults: County Lines guidance*.

Possible Risk Areas - Supply chain

The College's supply chain has been identified as a potential area of risk in terms of possible occurrences of modern slavery. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). In order to mitigate this the following action has been taken:

The College's Procurement function is supported by a published and implemented Sustainability Strategy and Procurement Strategy to which the College is fully committed. These strategies will contain steps that form part of the supplier selection process and will lead to ensuring that slavery and human trafficking are not taking place in the supply chain.

The following procurement categories have been identified as higher risk in terms of finding modern slavery and human trafficking occurrences in the supply chain:

- ICT Equipment and Services;
- Estates/Facilities Goods and Services;
- Construction;
- Catering.

When procuring goods, works and services in the higher risk categories the College ensures that suppliers are required to prove a high level of corporate social responsibility during the tendering and selection process, which includes checking whether they have a compliant Modern Slavery and Human Trafficking Statement.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organization, we intend to raise awareness of modern slavery and human rights abuses amongst our staff and deliver appropriate training.

Further Steps

The College is committed to better understand its supply chains and work towards greater transparency and responsibility towards people working within them.

The College will identify, with the support of other external specialist organisations, those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations. The College will monitor more closely those supply chain areas that have been identified as higher risk.

During the next year, the college aims to check the top 10 per cent of its suppliers (by spend), to confirm if they have published a modern slavery statement on their website.

The College will seek to raise awareness of modern slavery and human trafficking considerations within specific procurement categories. These considerations will then form part of the supplier selection process for goods, works and services in these categories.

Suppliers who are identified as being in the higher-risk areas will be asked to commit to the [Base Code](#) of the [Ethical Trading Initiative](#) (ETI) and the College will be working to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;

- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practiced;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

Review

No reports were received from employees, the public or law enforcement agencies to indicate that modern slavery practices had been identified in our business or supply chain.

Approval

This Statement has been approved and published by the College Finance & General Purposes Committee and will be reviewed annually and updated accordingly.

This statement will be made available to all staff members, stakeholders and the general public by publication on the College website.

Signed:



Karen Phillips
Principal

Signed:



Nigel Bayford
Chair of Governors