

# Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes West Nottinghamshire College's slavery and human trafficking statement for the financial year ended 31 July 2016.

## Organisational Structure

West Nottinghamshire College is a further education college that was incorporated under the Further and Higher Education Act 1992. The college employs approximately 1,000 staff and its core business is delivering education and training to around 25,000 people a year.

The college has an annual turnover of around £55m a significant proportion of which is spent on goods and services to support the running of the college.

The college's supply chain is made up of a number of third party providers, many of which are procured through a recognised consortium for the education sector.

## Supply Chain Management

The college sources a wide range of goods and services from suppliers across the United Kingdom.

In all its dealings with those suppliers the college strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there will be increased focus on the requirements for a long term commitment by those suppliers to eradicate slavery and human trafficking in their own business and supply chains.

We are working towards understanding all potential modern slavery risks related to college business and putting in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chain.

## Due Diligence

The college undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Enquiries about businesses' understanding of the Modern Slavery Act 2015 are being embedded within the business questionnaires used for supplier appraisal used with tenders for the supply of goods and services, except where framework agreements are used. Where such agreements are used, the college works with the framework agreement operators (such as the Crescent Purchasing Consortium) who are undertaking these enquiries on behalf of the education sector.

There are mandatory questions and guidance relating to slavery and human trafficking being embedded in the Standard Selection Questionnaire (SQ) that the college now uses, these include:

- Mandatory exclusion for any organisation that has been convicted anywhere in the world for any offence relating to Child Labour and other forms of trafficking in human beings (including offences under sections 2 or 4 of the Modern Slavery Act 2015).
- Declaration of whether they are a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015 and whether they are compliant with the annual reporting requirements contained within the Act.

## Relevant Policies

The college operate the following policies (currently under review) that are relevant to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** – West Nottinghamshire College encourages all its workers, customers and other business partners to report any concerns related to direct activities, or supply chains of the organisation.
- **Staff Code of Conduct** – Makes clear to employees the actions and behaviour expected of them when representing the organisation. The college strives to maintain the highest standards of employees conduct and are clear about our expectations regarding attendance, bullying & harassment, safeguarding and confidentiality.
- **Procurement Strategy (and associated guidance)** – Sets out our expectations in terms of procurement and ensures that we engage only high quality suppliers consistent with our Financial Regulations.
- **Recruitment and Selection Policy** – The college has a robust policy for the recruitment of all staff including sessional and agency staff. In respect of agency staff only our central HR team are able to engage with agency and we only engage with high quality agencies and ensure appropriate checks are carried out on any workers engaged through agencies.

All these policies are regularly reviewed and alongside other relevant policies the risks associated with slavery and human trafficking will be considered as part of the review process.

## Approval

This statement has been approved by the college's senior management and will be reviewed annually.

**Approved by the Principal & Chief Executive**  
**May 2017**