



# South Gloucestershire and Stroud College

## Anti-slavery and Human Trafficking Statement

### 1. Introduction

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes South Gloucestershire and Stroud College's (the College's) slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2025.
- 1.2 The 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 has taken and continues to take, to ensure compliance with the Modern Slavery Act 2015, to avoid the risk of modern slavery occurring within college services.

### 2. Our Commitment

- 2.1 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 another to exploit them for personal or commercial gain.

### 3. College policies

- 3.1 The College has implemented several policies to ensure it is conducting business in an ethical and transparent manner. These include:
  - **Grievance and Whistleblowing policies** – 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 Anti-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** – 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.
  - **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.

#### **4. Due diligence processes**

4.1 As part of our initiative to identify and mitigate risk, 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 on-going assessment and review.

4.2 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 whistle-blowers.

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

- Stationery;
- Catering;
- Cleaning services and consumables;
- Recruitment;
- IT and consumables;
- Audio Visual equipment.

#### **5. Supply chains**

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

- Procurement;
- Estates;
- IT & Media;
- Art & Design.

5.2 When procuring 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 during any tendering and selection process.

5.3 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.

#### **6. Training**

6.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, there is a section on modern slavery within the annual safeguarding training which is delivered online.

## **7. Recruitment practices**

- 7.1 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.
- 7.2 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.

## **8. Performance indicators**

8.1 If the College identify risks of modern slavery occurring in any part of its services, it will aim to introduce measures to remove the risk, to include:

- Remove supplier or agency from Colleges supply list
- Report to the relevant authorities
- Review measures to mitigate a repeat occurrence

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.

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

This statement has been approved by the Corporation and will be reviewed at least once annually.

Signed: Kevin Hamblin  
**CEO & Executive Principal**  
Date: 5 December 2024