

# Slavery and Human Trafficking Statement

January 2021

## Introduction

This statement sets out Shipley College's actions to understand all potential slavery and human trafficking risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities from the date of adoption by the Corporation and will be reviewed at least every 3 years.

As a General FE College, Shipley College recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This is not a legal responsibility as the College turnover is well below the £36m turnover which makes this a requirement.

The organisation is absolutely committed to preventing slavery and human trafficking in all its activities, and to ensuring that, as far as is reasonably practicable, its supply chains are free from slavery and human trafficking.

## Shipley College

Shipley College is a small, friendly College that is proud of its reputation as a provider of learning services to all. Shipley College changes lives. We aim to develop professional, independent and confident people who can excel in their chosen careers or personal interests. We are based in the heart of the World Heritage Site of Saltaire. We employ approximately 300 staff and offer services to approximately 3700 students.

The College is supported by a centralised procurement and contracting team (Resource Management Group) with transactional purchasing devolved to individuals and individual departments, controlled centrally by the Finance Service/Team.

## Our pledge on slavery and human trafficking - recruitment and employment

Within its recruitment and employment practices, Shipley College pledges to achieve the following standards:

- Employment is freely chosen
- Working conditions are safe and hygienic
- Child labour shall not be used
- National minimum wages are met
- Working hours are monitored and not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

Shipley College continues to ensure all employees receive a contract of employment and that appropriate Right to Work checks have been completed. Making sure our workforce is legally able to work in the UK is of prime importance to the College and therefore our recruitment agency suppliers are expected to provide assurance that the appropriate checks have been made on any person they are supplying. Shipley College continues to ask for sight of original passport or ID documentation from both paid employed, contractor and supply individuals and the staff involved in such checks are fully aware of the reporting process for concerns and issues.

## Shipley College Policies

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

1. Whistleblowing Policy & Procedure
2. Supply Chain Fee & Subcontracting Policy
3. Sustainability & Environmental Policy
4. Recruitment & Selection Policy
5. Safeguarding Policy & Procedure

Our policies and procedures are updated regularly and designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas
- reduce the risk of occurrence
- provide adequate protection for whistleblowers

## **Non-employed, Agency Staff & Volunteers**

Shipleigh College is committed to ensuring that agency staff, volunteers and staff not directly employed by the College are treated as fairly as possible.

This is done by:

- Checking an agency's pay policy to ensure payments are made in an ethical way
- Providing experience for volunteers rather than have them fill a vacant post
- Ensuring that we provide work to meet the volunteers need rather than that of the College
- Ensuring volunteers are not carrying out work for the College for an unreasonable period of time

All agency staff and volunteers are required to complete basic mandatory training covering safeguarding, GDPR and Equality and Diversity.

## **Our Supply chains**

Since adoption of this commitment in our 2016/17 statement, the Procurement Team and Finance Department are reviewed the supplier base and have taken the necessary steps to ensure, as far as is reasonably practicable, modern slavery is not taking place within their organisations.

The College promotes the use of framework agreements, where possible, through partner organisations such as the CPC or CCS. These framework agreements have built-in vetting processes for all suppliers that satisfy the College with regard to slavery and human trafficking.

Work within the FE and procurement sectors has identified a mixture of goods and services that are typical to FE that are potential high risk areas as they have either complex global supply chains or jobs that are seen as low skilled. The College has identified the following as its principal areas of potential risk and as such will take particular care in procurement in these areas:

- IT equipment

- Clothing and uniforms
- Food
- Outsourced cleaning
- Outsourced security services

Shipleigh College will try to ensure all substantial contracts are renewed through public sector framework agreements for these higher risk areas.

Shipleigh College is committed to acquiring goods and services for use without causing harm to others. In doing so, the College recognises the importance of supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights; the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity.

The College will not support or deal with any business knowingly involved in slavery or human trafficking.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation. A dedicated page within the Staff Employee Handbook is in place to provide advice and guidance to employees on the complex topic of slavery and trafficking. A systematic review of policies and training materials has taken place and continues to take place to ensure the subject of modern slavery and human trafficking is reflected where appropriate.

All members of the College's Procurement Team, Senior Management Team and HR have completed e-learning Human Trafficking Awareness training.

We will ensure we protect whistleblowers.

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