

# Modern Slavery Statement

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Loughborough College, and their commercial entities to prevent modern slavery and human trafficking in our organisation and supply chains.**

## **1. Introduction**

- 1.1. As a college, we reaffirm our shared commitment to the highest standards of ethical conduct and integrity. We have a zero-tolerance approach to modern slavery and are committed to acting ethically, transparently, and with integrity in all our relationships.

## **2. Our Organisation**

- 2.1. Loughborough College acquired the assets and liabilities of the SMB College group on the 1<sup>st</sup> August 2025 as a result of merger, and is now a larger and more diverse educational institution. The College offers a broad curriculum of further and higher education, apprenticeships and employer training. With an expanded workforce and supply chain we are actively aligning systems and procedures to uphold a zero-tolerance approach to modern slavery.
- 2.2. Loughborough College and SMB College Group merged on the 1<sup>st</sup> August 2025. We employ staff and engage contractors, suppliers and partner organisations to support our operations.

## **3. Scope and purpose**

- 3.1. This policy applies to all post-merger Loughborough College and the Leicestershire College employees and other subsidiary companies.
- 3.2. This statement is made on behalf of Loughborough College and all subsidiary companies with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.
- 3.3. This document relates to actions and activities during the financial year 1st August 2024 to 31<sup>st</sup> July 2025.

## **4. Policy Statement**

- 4.1. The merged college is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws

Name:	Modern Slavery Statement	Owner:	Executive
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Version:	1.0	Next Review:	August 2025

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implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.

- 4.2. As a merged college we are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains.
- 4.3. This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## 5. Impact Assessments


- 5.1. This policy/procedure has undergone an impact assessment process during review to ensure that any foreseeable risks and implications have been appropriately considered.
- 5.2. Equal Opportunities: The policy has been reviewed to uphold principles of equality and non-discrimination in accordance with equal opportunities legislation, ensuring fair treatment for all individuals.
- 5.3. Data Protection: All personal data processing activities governed by this policy have been assessed for risk and are fully compliant with current data protection laws. Privacy-by-design has been embedded as a core approach, with safeguards implemented to protect data subjects.
- 5.4. Safeguarding, Health & Safety, and Environmental Sustainability: Relevant aspects of safeguarding, health and safety, and environmental sustainability have been impact assessed to support a secure, inclusive, and responsible working and learning environments for all.

## 6. Organisational Structure

- 6.1. Loughborough College is a further education college and is an exempt charity. It delivers education and training to around 12,000 students annually including training delivered on company premises, apprenticeships and classroom-based activity. This figure is for 2024/25 and is prior to merger, and it is anticipated this figure will grow to 18,000 students in the academic year 2025/26.
- 6.2. Loughborough College operates in the United Kingdom and had a turnover of £52.4m for financial year 2024/25 of which approximately £20m is spent on goods and services to support the running of the College. This figure is prior to merger and post-merger it is anticipated turnover will grow to £82m and the amount spent on good and services will grow to £30m in the academic year 2025/26.

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- 6.3. Loughborough College also employs 1,000 members of staff (including full-time, part-time and sessional). This figure is for 2024/25 and is prior to merger, and post-merger it is anticipated this will grow to 1,500 in the academic year 2025/26.

## **7. Due Diligence and Relevant Policies**

- 7.1. We are aligning and strengthening policies from both legacy colleges to reflect a unified and proactive stance against modern slavery.
- 7.2. Loughborough College is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow College policies. We will expect our suppliers to hold their own suppliers to the same high standards.
- 7.3. All employees and persons employed within the College are asked to familiarise themselves with College policy at the start of their employment or association and are contractually obligated to adhere to the College's policies.
- 7.4. We are satisfied from our own due diligence measures that there is no evidence of any act of modern-day slavery or human trafficking within our own organisation. The College's supplier approval process incorporates a review of the controls undertaken by the College's potential suppliers. The College will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking. The College has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.
- 7.5. The vast majority of the College's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.
- 7.6. The College has a number of policies that assist in preventing slavery and human trafficking in its operations; including;
- Whistleblowers, to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.
  - Subcontracting fees and charges policy and provision statement
  - Financial Regulations (including anti-fraud, bribery and corruption policy and code of tendering practice)
  - Safeguarding Policy
  - Procurement strategy

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- Anti-bullying Policy
- Recruitment and Selection Policy
- Grievance Policy

## 8. Responsibilities

- 8.1. Ultimate responsibility for the prevention and prevention of modern slavery within the College rests with the College's Senior Executive Team. Loughborough College has an overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations. Team leaders / Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## 9. Our supply chains

- 9.1. We work with a wide range of suppliers and contractors across sectors such as construction, facilities management, catering and IT. We are currently reviewing all supplier relationships inherited from both legacy institutions to ensure modern slavery compliance through:

- Contractual obligations requiring adherence to the Modern Slavery Act.
- Risk based supplier assessments and audits.
- A standardised due diligence process across procurement activities.

- 9.2. A significant proportion of the College's demands are fulfilled by means of using national and regional framework agreements made available by Purchasing Consortiums. Consortiums requests many of the suppliers in high-risk areas to commit to the Base Code of the Ethical Trading Initiative (ETI) and is working to persuade all suppliers in these categories to commit to the Base Code. The majority of the College's demand for ICT equipment and products, including parts and accessories, is also fulfilled by means of using national and regional agreements. Consortiums supports the principles of and works closely with Electronics Watch and includes contract-monitoring clauses created by Electronics Watch in all relevant agreements awarded by the Consortiums and used by the College. Any labour provision or sub-contracting must be disclosed to the College. Checks will be completed by the College to confirm and ensure expected and required accreditation and practice.

- 9.3. The College has a number of suppliers for various parts of the organisation. These include:

- Agency staff including teaching and business support

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- Business partners
- Apprentice employers
- External contractors including advisors, builders and consultants
- Guest speakers and lecturers
- Printing of college promotional materials
- Advertising, including digital and print
- Merchandise
- Sport Sub-contractors
- Sponsorship and charity
- Indirect and direct products
- Travel and accommodation (especially international)
- Food and catering
- ICT and Audio Visual (AV) equipment and products
- Estates (Hard and Soft Facilities Management) Works, Products and Services

## **10. Due diligence processes for slavery and human trafficking**

10.1. As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess 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


## **11. Reporting Modern Slavery within the College or its Suppliers**

11.1. The College's whistleblowing and safeguarding policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the College or its suppliers will be reported by employees in this manner. The aforementioned policies apply to employees and may be found on SharePoint and the College website.

11.2. To surmise, any suspected instance of modern slavery or human trafficking within the College or its suppliers must be reported to the College Designated Safeguarding Lead,

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or Deputy Designated Safeguarding Lead, who will investigate and advise the appropriate people of any further actions. The details of the College Designated Safeguarding Lead and Deputy Designated Safeguarding Lead are widely available to all staff members on the staff dashboard and are published on the College website and College safeguarding policy.

- 11.3. Failure to comply with this policy may lead to cessation of contracts and/or disciplinary action.

**12. The steps we will take to further the goals of the Modern Slavery Act 2015 are:**

- 12.1. The College reconfirms its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working on them. We will continue to work with our partners and suppliers to undertake supply chain due diligence and mitigate the risks to human rights in our supply chains. This will include:

- 12.1.1. Conducting risk assessments to determine which parts of the College and its suppliers are most at risk of modern slavery so that efforts can be focused on those areas.
- 12.1.2. Engaging with our suppliers to convey to them the College's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses.
- 12.1.3. Seek to introduce additional pre-screening measures for suppliers.
- 12.1.4. Introduce contractual provisions for our suppliers to confirm their adherence to College policy.
- 12.1.5. Publishing this statement and policy on the College's website to clearly display the College's support to end modern slavery.

**13. Training, Communication and Awareness**

- 13.1. We are delivering updated training to all relevant staff across both legacy campuses, focusing on identifying risks of modern slavery, reporting mechanisms and understanding legal obligations. This includes induction for new staff and refresher training post-merger.
- 13.2. The College will ensure that key staff undertake training on modern slavery, where deemed necessary and will engage with external training providers, as appropriate.
- 13.3. This policy is displayed on the College website and on the Colleges intranet, the policy location is conveyed to all staff members at their induction.

**14. Monitoring and Review**

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14.1. This statement will be reviewed annually. As a merged college, we will continue refining and strengthening our policies, processes and training to ensure a united and proactive stance against all forms of exploitation.

14.2. The Modern Slavery Statement and Policy will be reviewed by the College's Executive Management team in accordance with clause 6 of the Modern Slavery Act 2015.

## 15. Location and Access

15.1. This document can be found here:

- The Loughborough College Group's Website
- The Loughborough College Group's SharePoint

## 16. Linked Policies and Procedures

16.1. You may wish to view the following policies:

- N/A

## 17. Change Log

Date	Version	Details of Change	Reviewer	Reviewer Title
1 <sup>st</sup> July 2025	1	Executive approved version in support of 2025/26 and reference to merger from the 1 <sup>st</sup> of August 2025	Hari Khurmi	Chief Finance Officer

As approved by the Principal & CEO on 1<sup>st</sup> August 2025

Signed by

Corrie Harris  
Principal & CEO  
Loughborough College

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