

Modern Slavery Policy Statement

1. Scope and purpose

- 1.1 This policy applies to all Loughborough College and the Leicestershire College employees.
- 1.2 This statement is made on behalf of Loughborough College and its subsidiary company the Leicestershire College 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.
- 1.3 This document relates to actions and activities during the financial year 1st August 2021 to 31st July 2022.

2. Policy Statement

- 2.1 Loughborough College is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.
- 2.2 We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains.
- 2.3 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.

3. Organisational Structure and Supply Chains

- 3.1 Loughborough College is a further education College and is an exempt charity. It delivers education and training to around 11,000 students annually including training delivered on company premises, apprenticeships and classroom based activity.
- 3.2 The College operates in the United Kingdom and had a turnover of £34million in 2020/21 of which approximately £13m is spent on goods and services to support the running of the College.
- 3.3 The College also employs 779 staff of which are 375 Full time, 201 Part time and 203 Sessional.
- 3.4 The College has a number of suppliers for various parts of the organisation. These include:

- Agency staff including teaching and business support
- 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

4. Due Diligence and Relevant Policies

- 4.1 The 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.
- 4.5 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
 - Anti-bullying Policy
 - Recruitment and Selection Policy
 - Grievance Policy

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

- 5.1 The College is aware of its responsibilities under the Act and is developing a framework to ensure its supply chain complies with the Act; this will include:
- 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.
 - 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.
 - Seek to introduce additional pre-screening measures for suppliers.
 - Introduce contractual provisions for our suppliers to confirm their adherence to College policy.
 - Publishing this statement and policy on the College's website to clearly display the College's support to end modern slavery.

6. Responsibilities

- 6.1 Ultimate responsibility for the prevention and prevention of modern slavery within the College rests with the College's Senior Executive Team. Loughborough College has 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.

7. Reporting Modern Slavery within the College or its Suppliers

- 7.1 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.
- 7.2 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, 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 Colleges website and college safeguarding policy.
- 7.3 Failure to comply with this policy may lead to cessation of contracts and/or disciplinary action.

8. Training, Communication and Awareness

- 8.1 The College will ensure that key staff undertake training on modern slavery, where deemed necessary and will engage with external training providers, as appropriate.
- 8.2 This policy is displayed on the College website and on the College's intranet, the policy location is conveyed to all staff members at their induction.

9. Review

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

10. Change log

Date	Version	Details of change	Review / Revision by	
			Name	Title
29 th June 2021	1	Executive approved version	Hari Khurmi	Vice Principal Finance and Infrastructure