

# Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that the Salford City College has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business operations or our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The College has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or its supply chain.

## Introduction

Salford City College is one of the largest and most successful colleges in the Country within excess of 11,000 learners annually of which over 4,000 are full time 16–18-year-olds. The College has a history of delivering high quality teaching and learning resulting in high pass rates.

With income in the region of £40 million and employing over 600 FTE staff, we make a broad contribution to the Greater Manchester economy through the work that we do.

In line with College values, the College is committed to ensuring there is no modern slavery or human trafficking within any part of its business or supply chain.

## Our high-risk areas

In regular assessment and monitoring of business operations it is of paramount importance that the College systematically considers its wider business and assess possible high-risk areas to ensure that they are free from slavery, servitude, human trafficking and forced labour.

The area of our business which warrants the greatest contemplation is involvement with suppliers. The College must be diligent in assessing the operations of the suppliers it engages with to ensure that the conditions of staff working for the supplier are fair and in line with our commitment to anti-slavery measures.

## Our suppliers

Salford City College operates a supplier policy and maintains a preferred supplier list. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

- We may terminate the contract at any time should any instances of modern slavery come to light

### **Due diligence in relation to slavery & human trafficking in its supply chain**

The College's Financial Regulations have been updated to include reference to the Modern Slavery Act, and key finance colleagues have been briefed on its implications for procurement. The College has recently appointed a Procurement Representative who will act as a central co-ordinating point for procurement policy.

### **Our policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment policy. The College operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. The College operates a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of business conduct. This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

### **Due diligence in relation to slavery & human trafficking in its business**

PAT employs people solely within England. Our recruitment processes are set out in our Safer Recruitment Policy and ensure that all prospective employees are legally entitled to work in the UK with additional checks around confirmation and recording Right to Work in the UK.

# Modern Slavery Policy

## Anti-slavery and human trafficking policy

### **1. Policy statement**

- 1.1 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 by another in order to exploit them for personal or commercial gain. Salford City College (the College) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **2. Responsibility for the policy**

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 Procurement has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### **3. Compliance with the policy**

- 3.1 Staff must ensure that they have read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for or with the College.
- 3.3 Staff must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of their business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 Staff that believe or suspect a breach of this policy has occurred or that it may occur, must notify their manager or report it in accordance with the College's Whistleblowing Policy as soon as possible.
- 3.6 Staff unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of the College supply chains constitutes any of the various forms of modern slavery, must raise it with their manager or Procurement.
- 3.7 The College encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The College are

committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the College business or in any of our supply chains.

**4. Communication and awareness of this policy**

4.1 Training on this policy, and on the risk the College business faces from modern slavery in its supply chains will form part of the induction process for all individuals, and regular training will be provided as necessary.

**5. Breaches of this policy**

5.1 The College may terminate their relationship with any individual and organisation working on the College's behalf if they breach this policy.

**Issue: 1**

**Issue Date: 01/03/2022**

**Approved: 29/03/2022**

**Approved by: Senior Leadership Team**