

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### 1. Introduction

- i. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31st July 2018.
- ii. The South Thames Colleges Group 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 Group is taking (and intends to take) to avoid the risk of modern slavery occurring within its services.

### 2. Organisational structure

- i. The South Thames Colleges Group provides general Further Education and Higher Education to about 22,000 students.

### 3. Due diligence processes

- i. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our Group services, it will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review and we will develop 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 chain.
  - Protect whistle blowers.
- ii. The Group identifies the following as the principal areas of potential risk: - supply chains for goods and services, particularly IT equipment and uniforms; outsourced cleaning and security services - recruitment agencies for temporary staff.

### 4. Supply chains

- i. In its supply chains, the Group has identified the following business areas as carrying material risks of modern slavery occurring:
  - IT equipment
  - Clothing and uniforms
  - Outsourced cleaning
  - Capital construction projects
  - Outsourced security services
- ii. When tendering any types of goods or services we intend to require any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- iii. When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the Group will require any supplier to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.

- iv. Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with the Group that does not comply with the Modern Slavery Act 2015, or the Group's own policies and procedures, will be removed from the Group's list of suppliers and will not be considered for future supply to the Group unless they can demonstrate that these compliance requirements are met.
- v. In terms of future steps, the Group will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

## 5. Training

- i. To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff responsible for recruitment, procurement and contract management.

## 6. Recruitment practices

- i. Temporary staff and staff recruited indirectly by the Group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the Group will also conduct checks on such agencies before they are approved.
- ii. Through its recruitment processes, the Group ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

## 7. Group policies

- i. The Group already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Group business. The Group operates the following policies and procedures:
  - **Grievance and Whistleblowing procedures** – these procedures allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
  - **Professional Code of Conduct** – this code sets out the actions and behaviour expected of them whilst employed by the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
  - **Financial Regulations** – these documents reflect the Group'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 and Selection procedure** – this procedure ensures that the Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 8. Performance indicators

- i. Where the Group has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Group 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.
  - Assessment of third party suppliers of relevant goods and services and their supply chains.

- ii. This statement will be made available to all staff members, stakeholders and the general public via our websites. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures.
- iii. Having assessed the training needs for staff operating in different parts of the Group, the Group will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in co-operation with external, specialist training providers.

For any general concerns regarding anti-slavery, there is a wealth of information and contact points through the following link:

<http://www.antislaverycommissioner.co.uk/resources/>

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