

LEEDS CITY COLLEGE GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Agreed by the Board of Leeds City College Group on 19 December 2016

Our Commitment

Leeds City College Group is committed to ensuring that slavery and human trafficking have no place in our business or our supply chain.

Purchasing Policy

The college's Purchasing Policy states that the college incorporates social, economic and environmental considerations into supplier and product selection and purchasing processes and that we ensure that we comply with all statutory and organisational requirements applicable to purchasing. Our commitment to ensuring that we do not purchase goods and services affected to human slavery, trafficking or other forms of exploitation is encompassed within this policy statement.

Assessing and Managing Risk

The Home Office statutory guidance on modern slavery states that an organisation's approach to modern slavery should be based on assessing and managing risk.

The college is engaged in the provision of further and higher education services. The risk of human slavery and trafficking in the organisation's own business, as distinct from its supply chain, is low in view of our existing policies and procedures in relation to recruitment and safeguarding.

Risks of human slavery, trafficking and other forms of exploitation being embedded in the goods and services supplied to the college are likely to arise where:

- goods are produced, processed or transported through countries with a high risk of human exploitation e.g. eastern Asia, parts of Africa
- other suppliers purchase or utilise goods falling into this risk category
- UK organisations working with or supplying staff to the college follow recruitment practices which fail to manage the risk of inadvertently supporting human trafficking activities.

A further reputational risk to the college is where the college engages with or partners with other organisations who are not vigilant in relation to modern slavery and human trafficking.

Where the college forms part of the training and organisational development supply chain for commercial customers with a turnover in excess of £36m, such customers may also be expected to ask the college about our procedures and take the college's response into account when determining whether to engage with the college for their training and organisational development requirements.

Actions taken during financial year 2015/16

1. A risk assessment process has been undertaken in relation to the supply of low value goods known to originate from eastern Asia or be assembled from items which originate from eastern Asia, such as stationery and identity cards/related items. Suppliers of goods such as these have been asked to confirm they have procedures which identify modern slavery risk and ensure suppliers have appropriate safeguards in place.
2. Suppliers of temporary staff have been contacted to ensure that their staff are aware of the

objectives of the Modern Slavery Act 2015 and have appropriate safeguards in place.

3. Where the college can exercise the greatest influence over other organisations, we have ensured their management and staff are aware of the objectives of the Modern Slavery Act 2015 and have appropriate safeguards in place. In particular, this has been done by including enquiries about understanding of the Modern Slavery Act 2015 within the partner providers' due diligence process.
4. The national Procurement Advisory Group for FE Colleges recommends use of the Chartered Institute of Purchasing and Supply (CIPS) Ethical Procurement and Supply e-learning course for individual members of staff who will play a key role in this area of work. Those staff within the Procurement Team in the Finance Directorate who play a key role in this area of work have undertaken this training.
5. The Home Office statutory guidance outlines steps which are available to businesses where any incidence of modern slavery is identified, including reporting the matter to the Police if modern slavery is identified or suspected in the UK. It is not proposed to develop any specific college plans for remedial actions. Any remedial actions to be taken would be applied in partnership with our immediate suppliers and advocacy organisations. No remedial action has been required to date.

Future Actions

6. Enquiries about businesses' understanding of the Modern Slavery Act 2015 are being embedded within the business questionnaires used for supplier appraisal used with tenders for the supply of goods and services valued over £20,000, except where framework agreements are used. Where such agreements are used, the college works with the framework agreement operators (such as the Crescent Purchasing Consortium) who are undertaking these enquiries on behalf of the education sector.
7. All suppliers who are paid more than £50,000 per year will be contacted requesting details of the steps they are taking to ensure that slavery and human trafficking is not taking place within their businesses and supply chains and requesting copies of any relevant policy documents dealing with this issue.
8. Leeds College of Music, whose turnover is less than the statutory minimum threshold (£36m), but which is a subsidiary of the college, will be adopting similar procedures.
9. White Rose Resourcing Ltd., whose turnover is less than the statutory minimum threshold (£36m), but which is a subsidiary of the college, will be adopting similar procedures in relation to temporary staff recruitment procedures.
10. Leeds Apprenticeship Training Agency Ltd., whose turnover is less than the statutory minimum threshold (£36m), but which is a subsidiary of the college, will be adopting similar procedures in relation to temporary staff recruitment procedures.

This statement has been approved by the Executive Leadership Team and will be reviewed annually by the college.

This statement has been approved by the Leeds City College Governing Body.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our college's slavery and human trafficking statement for the academic year ending 31st July 2016.

A handwritten signature in black ink that reads "Shaid Mahmood". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Signed

Dr Shaid Mahmood
Chair of the Board of Governors