

# Equality, Diversity & Inclusion Policy and British Values Policy 2021 - 2024

Including Appendix 3:  
Anti-slavery and Human Trafficking Statement



Education & Skills  
Funding Agency

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## INTRODUCTION

- 1.1 Leeds College of Building recognises that it is an integral part of the local and wider community. The College serves the needs of a wide range of individuals from the diverse ethnic and social mix of multicultural Britain. The College values difference and recognise that people with different backgrounds, skills, attitudes, and experiences bring fresh ideas, perceptions and encourage harmony and understanding to the College community<sup>(1)</sup>.
- 1.2 The College will seek to safeguard and actively promote the interests of all equality groups outlined in the Equality Act 2010 with reference to the nine protected human characteristics; Ethnicity, Gender, Gender Identity<sup>(2)</sup>, Disability<sup>(3)</sup>, Religion and Belief<sup>(4)</sup>, Age, Marriage and civil partnership, pregnancy and maternity, and Sexual Orientation. The College will work towards eliminating unlawful discrimination, harassment or victimisation on the grounds of the nine protected characteristics as well as discrimination on the grounds of a perceived or associative protected characteristic<sup>(5)</sup>. The College will promote equality of opportunity, the fundamental British Values of democracy, rule of law and individual liberty and ensure that students, staff and visitors feel welcome, safe, valued, included and respected in the College community.

## 2.0 LEGISLATIVE CONTEXT

- 2.1 The College recognises that legislation relating to equality and human rights is often complex and protection from discrimination can be found in several different pieces of UK and European legislation. The pieces of civil legislation which are central to this policy are listed in paragraph [A1] in the Appendices of this Policy. In some serious circumstances, a breach of the Equality, Inclusion and British Values Policy may constitute a criminal offence and the College may need to report this to the Police. The legislation which can potentially criminalise an incident of misconduct under this policy is listed in paragraph [A2] of the Appendices.

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### Notes

<sup>(1)</sup> 'College community' includes permanent and temporary staff, including those staff employed by third parties, all students, prospective students, those progressing through the admissions and selection process and visitors to the College including those supplying goods and services.

<sup>(2)</sup> Gender Identity includes people who have expressed an intention to undergo, are undergoing or have completed a process of gender reassignment. Other related words are transgender, gender reassignment or transsexual.

<sup>(3)</sup> The legal definition of Disability includes 'learning difficulty' and may include some 'medical conditions' or a temporary disability.

<sup>(4)</sup> The legal definition of 'Religion and Belief' also includes 'Non-Belief' and 'Philosophical Belief'.

<sup>(5)</sup> Discrimination on 'Perceived' ground refers to an assumption or belief made about a person which is the basis of a discriminatory act made against that person where this assumption is not correct. Discrimination on 'associative' grounds refers to discrimination suffered by a person because they are associated with a person who may have one or more of the named protected characteristics.

### 3.0 SCOPE OF THE POLICY

- 3.1 This Policy applies to all members of the College community and the general public. These groups include:
  - 3.1.1 Permanent and temporary staff, as well as those employed by third parties. The Policy also applies to people applying for employment at the College.
  - 3.1.2 All students enrolled on courses at the College.
  - 3.1.3 Prospective students including those progressing through the admissions and selection process.
  - 3.1.4 All visitors to the College including suppliers of goods and services.
  - 3.1.5 Work Based Learning students and their employers.
  - 3.1.5 Board of Governors

### 4.0 GENERAL AIMS OF THE POLICY

- 4.1 The Equality Act 2010 outlines the general duties for the public sector (those who receive public money) with respect to employment matters and the services they provide to their community. The Act 2010 also outlines specific duties for the providers of further and higher education. This Policy outlines the following aims which are derived from the general and specific duties outlined in the Equality Act 2010. The College will:
- 4.2 Work to eliminate unlawful discrimination, harassment and victimisation in connection with the nine protected characteristics named in [1.2].
- 4.3 Promote equality of opportunity, positive attitudes and good relations between all members of the College community. and Advance equality of opportunity between people who share a protected characteristic and those who do not.
- 4.4 Publish '**Equality Objectives**' with an action plan outlining the arrangements for implementing the Policy and publicising its contents to the College community and making the document publicly accessible.
- 4.5 Objectively assess the impact of College Policies on all members of the College community and stakeholders. This will be carried out for the purposes of identifying any differential impact the Policy may have on different equality groups. In doing this the College will undertake consultation with Trade Unions, the Staff Forum, students and other stakeholders. Under-represented and minority groups (relating to the protected characteristics groups [Equality Act 2010] – which includes staff or students) will also be invited to share their views and experiences in terms of equality and diversity in the College. This could be carried out by; face-to-face interviews or group meetings, student or staff surveys or walkthroughs conducted as part of the College's Observation of Teaching, Learning and Assessment.
- 4.6 Provide relevant equality, inclusion and human rights training to all staff to help them carry out their role with respect to the active promotion of equality of opportunity in the College community.
- 4.7 Monitor complaints received from, and the disciplinary sanctions taken against, any member of the College community.
- 4.8 Identify and take positive steps to address any under-representation of minority groups in the provision of employment and training or widening participation to include socially or economically disadvantaged students in the provision of education.
- 4.9 Take steps to balance the rights of individuals where the rights of individuals to enjoy their entitlements under the Equality Act [2010] may appear to conflict (see footer note 4.9). This will be done in a sensitive, fair and where possible in a non-discriminatory manner. The College recognises that rights must be exercised in a way which is compatible with the rights and interests of others. In these circumstances the College may take steps to discriminate against a particular

group and objectively justify its position that the action is a proportionate means of achieving a legitimate aim under the Equality Act [2010] or a necessary means for the efficient, fair and peaceful running of the College.

- 4.10 Carry out a self-assessment exercise to evaluate the implementation of the Policy and produce a report which will summarise any action that needs to be taken to address any identified areas of weakness.
- 4.11 The College will carry out an annual review of the procedures for supporting students who are disabled and or who have learning difficulties.
- 4.12 Fundamental British Values - PREPARING FOR LIFE IN MODERN BRITAIN
- 4.13 The College is committed to promoting fundamental British values through the curriculum and more widely through the tutorial programme.
- 4.14 The College will develop curriculum materials which promote human rights, British values, staying safe and encourage active citizenship through the curriculum to help prepare and support students for life in modern Britain and support them to become safer citizens (in the context of preventing radicalisation to extremist ideology).
- 4.15 The College's Equality, Diversity and Inclusion Committee will hold responsibility for scrutinising and monitoring the implementation of the Preparing for Life in Modern Britain programme (Terms of Reference for the Equality and Inclusion Committee can be found in Appendix 2).

***Note: 4.9 - example case law: Ledell v. Islington Borough Council [2009] EWA. The Court of Appeal has held that a registrar who refused to conduct civil partnership ceremonies between same-sex couples on the grounds that to do so would violate her Christian beliefs was not discriminated against on the grounds of her religion.***

The fundamental British values are:

- Democracy
  - Respect for the rule of law
  - Individual liberty
  - Mutual respect and tolerance of those with different faiths and beliefs.
- 4.16 In addition to British Values, values concerning rights and limitations to freedom of speech and right to life will also be promoted to students and staff. Human Rights Act [1998] – [Right to life and freedom of speech].
  - 4.17 Students will understand their own rights and the rights of others and learn to respect the rule of English civil and criminal law. Students will be encouraged to acquire respect for democracy and democratic processes, including respect for the basis on which the law is made and applied in the UK. Following the programme, students will gain:
    - An understanding of how citizens can influence decision making through the democratic process
    - An appreciation that living under the rule of law protects individual citizens and is essential for their well-being and safety
    - An understanding that there is a separation of power between the executive and the judiciary, and that while some public bodies such as the police and the army can be held to account through Parliament, others such as the courts maintain independence
    - An understanding that the freedom to choose and hold other faiths and beliefs is protected in law
    - An acceptance that other people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour

- An understanding of the importance of identifying and combating discrimination as outlined in the Equality Act [2010] and Human Rights [1998].

## **(SECTION A)**

### **5.0 LEADERSHIP, MANAGEMENT AND INDIVIDUAL RESPONSIBILITIES**

- 5.1 Governors will have responsibility to oversee that the College complies with equality legislation and the codes of practice supporting it. They will be aware of the Corporation's statutory duties in relation to equality legislation as an employer and service provider. They will consider the Annual Equality and Inclusion Report to ensure that the Equality and Inclusion Policy is being followed and will ensure that the membership of the Corporation reflects the diversity of the communities served by the College.
- 5.2 The Principal who has overall responsibility for the enactment of this Policy has delegated management responsibility of Equality and Inclusion to the Vice Principal Teaching, Learning and Quality. The Executive Team will give a consistent high-profile lead on equality issues and promoting equality both internally and externally. They will work with the Governors and Senior Management Team to ensure that the Policy and the College's Equality Objectives are fully implemented. They will ensure that appropriate action is taken against individuals working on behalf of the College who do not act in accordance with the policy.
- 5.3 The Equality and Inclusion Committee (Terms of Reference for the Equality and Inclusion Committee can be found in Appendix-2). will be responsible for overseeing the continuing application and development of the Equality, Inclusion and British Values Policy in line with legislation and the College's strategic objectives. They will assist in advising on and reviewing the College's Equality Objectives and Action Plans. They will report to the Senior Management Team on Equality issues and advise on the formulation of policies, procedures and resources.
- 5.4 The Equality, Inclusion and Safeguarding Manager will advise students, staff and the Senior Management Team on matters concerning equality and inclusion issues at the College. This will be in the context of employment matters and services to students.
- 5.5 Any member of the College community, who becomes aware of any acts of discrimination against another, has a duty to report this to the Equality, Inclusion and Safeguarding Manager or another relevant Manager to investigate.
- 5.6 Every employee is expected to assist the College in meeting its commitment to provide equality of opportunity to staff and students. Acts of discrimination, harassment, bullying or victimisation against any member of the College community is a disciplinary offence, and will be dealt with under the College disciplinary procedure. Any of the named acts may constitute gross misconduct and could lead to dismissal without notice.
- 5.6 Any member of the College community can be held personally liable as well as, or instead of, the College, for any acts of unlawful discrimination. An individual who commits a serious act of harassment may be guilty of a criminal offence.

***Specific roles and individual responsibilities are included in Appendix 1 of this Policy.***

### **6.0 COLLEGE ENVIRONMENT**

- 6.1 The College will aim to make its buildings as welcoming, safe and as accessible as possible for all users.
- 6.2 Offensive and/or discriminatory material will not be displayed in any part of the College estates. This includes the supply of any stock for the refectory or library, curriculum materials or any political,

social, religious or environmental campaign materials, which cannot justify a means of achieving a legitimate aim.

- 6.3 Access and facilities for disabled people will be provided in an inclusive way in the mainstream environment.
- 6.4 The College will provide relevant support facilities for staff and students wherever possible.
- 6.5 The College will provide access to multi-faith prayer facilities for students on all College sites. These facilities will include access to clean and appropriate washing facilities. Students will be encouraged to use these facilities.
- 6.6 The College will aim to maintain a clean and tidy environment and will ensure that offensive graffiti is erased quickly and effectively when discovered.
- 6.7 The College will aim to provide a catering service, which meets the equality needs of staff, visitors and students. The College will do this by assessing the catering demand that meets the religious and medical dietary requirements [e.g., vegetarian, kosher and halal] by monitoring employees and students on this issue at the start of each academic year.

## **7.0 MARKETING**

- 7.1 All publicity and marketing materials will project an inclusive and positive image of the diversity of population in society and in particular, the equality groups who are under-represented in the construction industry.
- 7.2 Course information and College recruitment advertisements will actively promote the College to encourage applications from members of under-represented groups in the community.
- 7.3 The College prospectus and Student Charter will include a statement of the College's commitment to Equality and Inclusion and will make students aware of the support services that are available in respect of facilities for disabled students and those with learning difficulties, access arrangements, learning support, guidance and counselling facilities.
- 7.4 Publicity and marketing information will be circulated as widely as possible within the community (and in alternative formats on request).

## **(SECTION B)**

### **8.0 EMPLOYMENT PRACTICE**

- 8.1 All staff recruitment material will clearly state and reflect the College's commitment to equality and inclusion and will promote the College as an equal opportunities' employer.
- 8.2 The College will ensure that no job applicant will receive less favourable treatment than another on grounds of the nine named protected characteristics or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.
- 8.3 No College employee will discriminate unfairly, directly or indirectly in making selection decisions.
- 8.4 All applications will be assessed accurately to clear, objective and job-related criteria.
- 8.5 The College will work in accordance with the Asylum and Immigration Act 1996 section 8 recruitment and selection requirements.
- 8.6 Staff with same sex partners shall be entitled to the same benefits in terms of special leave as their heterosexual colleagues. Staff with caring responsibilities will be supported through access to

dependent care leave. Job sharing shall be considered where this is practical. Requests for flexible and home working will be considered where appropriate.

- 8.7 Appropriate monitoring information will be collated during the recruitment of staff.
- 8.8 Everyone is required to work according to their contract of employment, including the number of days of annual leave overall and the annual hours worked. Where an employee makes a request for annual leave for a day related to a belief system, every attempt should be made to meet the request taking into account the needs of the College.
- 8.9 The College will treat sympathetically requests for unpaid extended leave of absence for religious purposes, such as pilgrimages, births, weddings, deaths in another country etc. Such requests will be granted if reasonable and practicable and in line with the needs of the business.
- 8.10 Participation in training and development activities will be monitored by ethnicity, gender, disability or learning difficulty and age. Where appropriate if inequality becomes apparent, positive action will be taken to redress the imbalance, including such measures as:
- Providing training where appropriate, raising awareness and development opportunities.
  - Under-represented groups will be encouraged to apply for training and employment opportunities with the College.
  - Wherever possible, specific training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit.
- 8.11 The College has signed up to the Employment Service's Disability Confident Employer Scheme <https://www.gov.uk/government/collections/disability-confident-campaign> and therefore, is committed to undertaking the required action in relation to disabled applicants and staff.
- 8.12 The College will use any specific assistance packages provided by the Employment Service to meet the needs of individual staff members. These include Access to Work and the Supported Employment Programme.

## **9.0 MONITORING AND DATA COLLECTION (STAFF)**

The Human Resources Unit will collect and manage information in line with regulatory practice relating to the ethnic, gender, age and disability profiles of staff. The Equality Inclusion and Safeguarding Manager will analyse the following information about staff and report the findings in the annual Equality and Inclusion Report. The findings will also be presented to the Equality and Inclusion Committee and to the Corporation.

- Numbers of staff in post by ethnicity, gender, disability, religion, belief, sexual orientation and age
- Job applications and selection success rates
- Staff recruitment and promotion
- Grievances, disciplinary and capability proceedings
- Satisfaction Surveys and Exit Interviews

## **10.0 COMPLAINTS**

- 10.1 The College will seek to provide a supportive environment for all members of the College community who make claims of discrimination or harassment.
- 10.2 Any discriminatory behaviour directed at any individual or group will be dealt with under the College Grievance and Disciplinary Procedure.

## **(SECTION C)**

### **11.0 STUDENT ADMISSIONS PROCESS**

- 11.1 College admission and recruitment procedures will be clearly stated to allow ease of access to all potential students.
- 11.2 All students' recruitment material will clearly reflect the College's commitment to equality and Inclusion and promote a safe and welcoming environment to all sections of the community.
- 11.3 The College will address areas of under-representation in terms of gender and ethnic profile of the student population in College through targeted positive action work. These groups are under-represented equality groups in the UK construction Workforce [2018].
- 11.4 The College will ensure that no student will receive less favourable treatment than another on the grounds of any of the named nine protected characteristics including their social or economic background. The College may take positive steps to encourage and support applications from under-represented groups; however admissions and selection decisions will be based on merit.
- 11.5 No College employee will discriminate unfairly, directly or indirectly in making selection decisions.
- 11.6 The College will promote the support and facilities available to students who have disabilities or learning difficulties throughout the application, selection and enrolment stages.
- 11.7 Students will be entitled to a comprehensive induction programme that will communicate the College's commitment to equality and inclusion.

### **12.0 CURRICULUM, TEACHING AND LEARNING (INCLUDING LANGUAGE, CULTURAL, RELIGIOUS AND SPIRITUAL NEEDS)**

- 12.1 All programmes of study will have open access, subject to meeting entry requirements.
- 12.2 Where possible, programmes will be delivered by various modes of attendance and flexibility to allow access to as wide a group as possible, promote lifelong learning and support 'educational inclusion'.
- 12.3 Programmes of study will be delivered in a manner which is not discriminatory.
- 12.4 Positive steps will be taken to balance the curriculum in respect of programmes of study for under-represented groups.
- 12.5 Learning support will be available to students with identified needs.
- 12.6 Students are encouraged to discuss requests for leave of absence for the observation of prayer with their tutor. Staff are expected to take reasonable steps to provide the students with support to catch up on their work.
- 12.7 Staff may authorise between 15-20 minutes for the observation of prayer. Staff will also need to ensure that minimum disruption is caused to students' programme of study.
- 12.8 Staff may authorise absences up to a total of 2 days per academic year for religious observation. This will not affect a student's Bursary entitlement.
- 12.9 In exceptional circumstances the Assistant Faculty Director or the Faculty Director may approve additional requests for religious observation.



### **13.0 MONITORING AND DATA COLLECTION (STUDENTS)**

13.1 The Equality Inclusion and Safeguarding Manager and DIS Manager will collect and analyse the following information about students and report the findings in the annual Equality and Inclusion Report. The findings will also be presented to the Equality and Inclusion Committee and to the Corporation.

- Number of students by course areas to reflect ethnicity, gender, disability, learning difficulty and age
- Retention and achievement rates
- Arrangement and delivery of additional support

## APPENDIX 1

### Specific Roles and Responsibilities

	Governors	Executive Team	College Management Team	Equality and Inclusion Committee	Faculty Directors	Assistant Faculty Directors	Curriculum Managers	Lecturers	All staff	Contractors, partners and service providers	All students
<i>To give a consistent high-profile lead on equality issues and promoting equality both internally and externally.</i>	P	P	P	P	P	P	P				
<i>Ensure that appropriate action is taken against individuals working on behalf of the College who do not act in accordance with the policy.</i>		P	P		P	P	P				
<i>To ensure that equality and inclusion is effectively integrated and promoted through the curriculum (including schemes of work and lesson plans.</i>			P		P	P	P	P			
<i>To ensure that the monitoring of performance gaps between different groups of students is undertaken in the Faculty and take effective steps to close any such gaps.</i>			P		P	P	P	P			
<i>Monitor how unacceptable and inappropriate actions, bullying, harassment and victimisation are effectively tackled within the classroom.</i>					P	P	P				
<i>Monitor the use of inclusive and differentiated teaching methods and how effective they are in meeting individual learner needs.</i>					P	P	P				
<i>Create and maintain an environment where bullying, harassment, victimisation and discrimination are considered unacceptable.</i>					P	P	P	P	P	P	P
<i>To support, promote and comply with the aims of the Equality, Inclusion and British Values Policy and procedures and understand the consequence of contravening equality legislation.</i>								P	P	P	P



## EQUALITY, DIVERSITY AND INCLUSION COMMITTEE – TERMS OF REFERENCE (2021 - 2024)

### 1. INTRODUCTION

The Equality, Diversity and Inclusion Committee will meet to ensure the College's Equality and Inclusion policies, procedures and practice take all reasonable steps to ensure members of the College community are protected from unlawful discrimination, victimisation, bullying and harassment as outlined in the Equality Act [2010]. In addition, the Committee will develop, implement and monitor strategies to support the inclusion of all groups within the College environment and in the promotion of construction and the built environment as a career route for all.

### 2. PURPOSE OF THE GROUP

The purpose of the group will be to scrutinise and evaluate the quality of the work the College carries out to implement the public sector equality duty and to ensure that equality of opportunity and inclusion matters are dealt with appropriately, consistently and in compliance with the Equality Act [2010] and the Codes of Practice: developed by the Equality and Human Rights Commission [EHRC]. In addition, the Group will monitor provision as outlined in the SEND Code of Practice 2015. This is Statutory Guidance for Local Authorities, Education, Health and Social Care providers around implementing the requirements of the Children and Families Act 2014 regarding working with students with Special Educational Needs and Disabilities (SEND). The College has a legal duty to make its best endeavours to provide support to its students with an Education, Health and Care Plan or Funding for Inclusion.

### 3. CONSTITUTION

#### 3.1 There shall be an Equality and Inclusion Committee consisting of the following members:

- Vice Principal Teaching, Learning and Quality, ex officio (Chair)
- Human Resources Manager ex officio
- Equality, Inclusion and Safeguarding Manager ex officio
- One Faculty Director, ex officio
- One Assistant Faculty Director
- Student Services Manager ex officio
- Head of Student Experience ex officio
- Quality Improvement & Enhancement Manager ex officio
- Apprenticeships Contracts Manager ex officio
- One representative from the student body, to be appointed by the Student Union.
- One representative from a recognised Trade Union or One representative from the Staff Forum
- Up to five internal co-opted members appointed at any time by and at the discretion of the Committee
- Up to three external co-opted members appointed at any time and at the discretion of the Committee who will reflect the views of the external community and stakeholders

3.2 The normal period of office of members appointed to the Committee shall be three years.

3.3 The Committee shall meet at least three times per academic year.

3.4 Five members of the Committee shall constitute a quorum.

- 3.5 Decisions shall be made by simple majority vote of those present at the meeting. In the event of tied vote, the Chairperson shall have a second or casting vote.

#### **4.0 TERMS OF REFERENCE - THE GROUP WILL WORK PROACTIVELY TO:**

- 4.1 Scrutinise and reflect on current Equality, Diversity and Inclusion practice at the College and monitor the implementation and effectiveness of the College's Equality, Diversity and Inclusion Policy.
- 4.2 Ensure all Equality, Diversity and Inclusion policies, plans and practice within the College have clear purpose and deliver successful outcomes for all members of the College community, specifically but not limited to employment practices, pay gaps and services to students.
- 4.3 Consider and monitor the College's provision for the promotion of British Values to the whole College community, alongside curriculum developments to promote equality of opportunity.
- 4.4 Develop strategies to support minority groups to access construction as a positive career path both as a student entering the industry, and as a teacher.
- 4.5 Develop appropriate partnership arrangements across the city with relevant equality related bodies / organisations and to align, share and improve on good Equality and Inclusion practice in the FE Sector.
- 4.6 Monitor the implementation of the legal and regulatory framework for Equality, Diversity and Inclusion.
- 4.7 Identify workforce development needs to support the professional development of staff. Monitor the implementation of training to ensure a positive impact.
- 4.8 Monitor the effectiveness of arrangements to support students who have Special Educational Needs and Disabilities (SEND).
- 4.9 Receive relevant briefings and updates to ensure that the role of the Committee can be effectively carried out.
- 5.0 Monitor and analyse data to inform decision making, reports, progress and improvements.
- 5.1 Provide reports to the Senior Management Team regarding strategic decision making and recommendations to continue to develop this area of work.



## **Anti-slavery and Human Trafficking Statement**

(Appendix 3 of the Equality, Inclusion and British Values Policy **2021 - 2024**)

## **1. Introduction**

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the College's slavery and human trafficking statement.
- 1.2 Leeds College of Building 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 College is taking (and intends to take) to avoid the risk of modern slavery occurring within College services.

## **2. Organisational structure**

- 2.1 The College is a further education College that employs approximately 400 staff, operating in the United Kingdom. Its core business is teaching a student population of approximately 7500 students. The College has an annual turnover of circa £19 million of which approximately £6 million is spent on goods and services to support the running of the College.

## **3. Due diligence processes**

- 3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of College services, the College 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.
- 3.2 The College will:
  - Ask all suppliers who have a turnover of £36 Million to comply with the Modern Slavery Act 2015.
  - Take reasonable and proportionate steps to identify and assess the potential risk areas in our supply chains. The Equality, Inclusion and Safeguarding Manager and The Director of Human Resources will take a lead on this (they will identify controls and measures to help to mitigate the risk of slavery and human trafficking occurring in the College supply chains).
  - Randomly select a sample of relevant suppliers to assess their compliance with Modern Slavery Act 2015.

## **4. Supply chains**

- 4.1 In its supply chains, the College has identified the following business areas as carrying some risks where modern slavery could occur:
  - a. Suppliers of cleaning and security services
  - b. Supplier of catering products and foods
  - c. And suppliers of construction and facilities management services
- 4.2 When procuring any types of goods or services, the College requires any relevant suppliers to operate a high level of corporate social responsibility during any tendering and selection process.
- 4.3 Any relevant supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the College's own policies and procedures, will be removed from the College's list of suppliers and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.

## **5. Training**

- 5.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide relevant training and briefings to our staff.

## 6. Recruitment practices

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

## 7. College policies

- 7.1 The College 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 College business. The College operates the following policies:

**Grievance and Whistleblowing policies** – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

**Employee Code of Conduct** – this code sets out the actions and behaviour expected of them whilst employed by the College. The College strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

**Anti-bribery and corruption policy** – the College is committed to the highest standards of ethical conduct and integrity in its business activities. The College will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.

**Financial Regulation (outlines procurement procedures)** – this policy reflects the college'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 policy** – this policy ensures that the College follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 8. Performance indicators

- 8.1 Where the College 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 College 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
  - training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action
  - oversight of third-party suppliers of relevant goods and services supply chains.
- 8.2 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

This statement has been approved by the College's senior management team and will be reviewed at least once annually by the Equality and Inclusion Committee.