

Anti- Slavery & Human Trafficking Statement

1. Introduction

- 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.
- 1.2 **This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Colleges slavery and human trafficking statement for the financial year ending 31/08/2021.**
- 1.3 Macclesfield College is committed to ensuring that there is no modern slavery or human trafficking in its supply chains, or 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 Macclesfield College of Further and Higher Education is a highly ambitious College and is a leading education provider in the heart of Cheshire, with over 2000 students studying further and higher education programmes and a large apprenticeship programme.
- 2.2 It has according to the statistics published in the National Achievement Rate Tables been confirmed as the overall best- performing FE institution within the key Cheshire and Warrington sub-region.
- 2.3 The College is strongly placed in the region to deliver the Cheshire and Warrington strategic economic plan. Ofsted rated 'Good' (November 2017), in 2019 it was the proud winner of the Business and Education awards East Cheshire Chamber.
- 2.2 The College has an annual turnover of £10.6 million.

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 risks and other relevant factors). These processes will be subject to on-going assessment and review.

- 3.2 As part of our initiative to identify and mitigate risk, we will have in place:
- A fair procurement process, requiring our suppliers to comply with all required legislation and regulations that relate to the relevant jurisdiction in which the suppliers operate and/or supply

- 3.3 The College identifies the following as the principle areas of potential risk:
- Recruitment agencies
 - Outsourced cleaning & catering suppliers

4. Our supply chains

- 4.1 The College has a zero-tolerance approach to modern slavery and human trafficking. It is committed to acting ethically and with integrity in all its business dealings and relationships. It seeks to ensure modern slavery and human trafficking are not taking place anywhere within the organisation or in any of its supply chains.
- 4.2 When procuring any types of goods or services, the College requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.3 Any 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.
- 4.4 In terms of future steps, the College will review the viability of introducing other due diligence for monitoring and managing identified risks, including risks associated with particular countries and products.

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 are identifying suitable training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

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 conducts checks on such agencies before they are approved.

- 7 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. Our policies on slavery and human trafficking
- 7.1 The College is committed to ensuring that there is no modern slavery or human trafficking in any of our supply chains or in any part of our business.
- 7.2 In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we will review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Emerging government policy on ethical supply chains will also be considered by the College.
- 7.3 Our workplace policies and procedures will demonstrate 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.

8 College Policies

- 8.1 The College currently applies the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of college business.

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 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 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.

Procurement Policies

The College's Procurement Policy is reflective of the Colleges commitment to act ethically and with integrity in all of our business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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.

The College's Recruitment Policy and employment processes in relation to both employees and third party workers entails rigorous checking of immigration and right to work documents and a strict adherence to ensuring that anyone undertaking work at the College is engaged correctly and in line with statutory legislation and College policy and procedure.

9. Performance indicators

9.1 Where the College identifies risks of modern slavery occurring in any part of its services, it will aim to introduce key performance indicators (KPIs) to measure progress against reducing such risks. The College will consider setting and reviewing KPI's 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
- Compliance with all College procurement policies

9.2 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.

9.3 Having assessed the training needs for staff operating in different parts of the College, the College will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

This statement has been approved by the College's governing body and will be reviewed annually.



Rachel Kay
PRINCIPAL AND CHIEF EXECUTIVE OF MACCLESFIELD COLLEGE
September 2021