Modern Slavery and Human Trafficking Statement 2023/24

Introduction

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 for the financial year ending 31 July 2024.

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.

Coleg y Cymoedd is committed to improving its practices to combat slavery and human trafficking in its supply chains or in any part of its services.

Organisational structure

Coleg y Cymoedd is a Further Education College with sites across RCT and Caerphilly in South Wales, that employs over 800 staff members, teaches in the region of 13,000 students and is one of the largest procurers of services and works in the locality.

The college has an annual turnover of £58m, of which approximately £14m is spent on goods and services to support the running of the college. The college's suppliers do not change on a seasonal basis and the percentage of employees on temporary / seasonal contracts is minimal.

The Late Payment of Commercial Debts (Interest) Act 1998, which came into force on 1 November 1998, requires Colleges, in the absence of agreement to the contrary, to make payments to suppliers within 30 days of either the provision of goods or services or the date on which the invoice was received. The target set by the Treasury for payment to suppliers within 30 days is 95 per cent. During the accounting period 1 August 2023 to 31 July 2024, the college paid 94.33 per cent of its invoices within 30 days.

Policies

The College is committed to employing staff, engaging with and supporting our learners, acquiring goods, services and works for its requirements, and otherwise conducting its business without causing harm to others. It is fully committed to acting ethically and with integrity in all its business dealings and relationships. In so doing, the College supports the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights. We will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced compulsory/bonded labour or human trafficking and that they are paid in line with the national living wage.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking, with the Senior Leadership Team taking responsibility lead for overall compliance.

As part of our commitment to combating modern slavery, we have in place the following policies and procedures:

- Anti-Bribery Policy;
- Procurement Operational Plan;
- Resolutions Policy;
- Equality and Diversity Policy;
- Safeguarding – Child Protection and Vulnerable Adults Policy;
- Sustainability Policy;
- Whistleblowing Policy;
- Recruitment Policy;
- Staff Code of Conduct.

Due Diligence

The College adopts a zero tolerance approach in relation to modern slavery and human trafficking and is committed to work to address areas of higher risk or concern.

The College purchases some of its goods and services from public sector purchasing consortia. The principal consortia used by the College are:

- National Procurement Service (NPS);
- Crescent Purchasing Consortium (CPC);
- Crown Commercial Services (CCS).

These consortia have developed processes, which are regularly reviewed and updated, to manage supply chain risk relating to slavery and human trafficking. In addition, the consortia have published their own Slavery and Human Trafficking Statements which state how they aim to address these issues through the procurement processes that they manage.

The College is also part of Welsh Government's Strategic Spend Analysis (through Atamis), which gives us access to TISC reports, which hold a database of suppliers who have compliant Modern Slavery and Human Trafficking Statements.

<u>Direct employment of staff</u>

The College mitigates the risk of the occurrence of modern slavery of directly employed staff through strict adherence to the robust recruitment and selection policy implemented by the People & Culture Department. Additionally, the College has in place a whistleblowing policy through which staff can raise concerns.

<u>Employment of staff through recruitment agencies and other sources</u>

Temporary staff and other staff recruited indirectly by the College are only recruited through established and accredited agencies who can provide assurance that they fully comply with the requirements of all legislation relating to the rights and welfare of their candidates and employees.

Learners

Although the risks of learners experiencing occurrences of modern slavery or human trafficking through direct contact with the College are extremely low, it is appreciated that in the communities where they reside, they may on very rare occasions be entrapped into adopting the lifestyle of a modern slave. In order to mitigate these circumstances, the College has a dedicated Welfare Team who can provide support and advice on their wellbeing, as well as signposting to relevant organisations where appropriate.

Appropriate staff members receive safeguarding training which includes issues related to modern slavery. The College also follows the recommendations in the Home Office publication *Criminal Exploitation of children and vulnerable adults: County Lines guidance.*

Possible Risk Areas - Supply chain

The College's supply chain has been identified as a potential area of risk in terms of possible occurrences of modern slavery. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). In order to mitigate this the following action has been taken:

The College's Procurement function is supported by a published and implemented Sustainability Strategy and Procurement Strategy to which the College is fully committed. These strategies will contain steps that form part of the supplier selection process and will lead to ensuring that slavery and human trafficking are not taking place in the supply chain.

The following procurement categories have been identified as higher risk in terms of finding modern slavery and human trafficking occurrences in the supply chain:

- ICT Equipment and Services;
- Estates/Facilities Goods and Services;
- Construction;
- Catering.

When procuring goods, works and services in the higher risk categories the College ensures that suppliers are required to prove a high level of corporate social responsibility during the tendering and selection process, which includes checking whether they have a compliant Modern Slavery and Human Trafficking Statement. For higher value procurements (Over Public Sector Thresholds), the tendering process requests suppliers to declare they are suitable suppliers with a turnover of more than £36m and therefore required to be compliant with the Modern Slavery Act. This has automatically been conducted where an existing Framework is utilised, by the Framework bodies themselves, so it isn't necessary for the College to conduct.

Further Steps

The College is committed to better understand its supply chains and work towards greater transparency and responsibility towards people working within them.

The College will identify, with the support of other external specialist organisations, those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations. The College will monitor more closely those supply chain areas that have been identified as higher risk.

The following table shows tenders completed during 2022/23 and 2023/24, including the tender route taken, the successful company and whether they publish their own modern slavery statement (turnover over £36m):

Tenders/contracts were procured for the following:	**Procurement Route:**	**Supplier**	**Turnover (pa)**
Building Cleaning Services	Framework	Bespoke	below £36m
Estate Professional Consultancy Services	Framework	RAM Consultancy	below £36m
Finance System replacement	Open	Tisski/Node4	below £36m
ICT Virtual Server Infrastructure	Framework	DTP	below £36m
Internal Audit Services	Framework	TIAA	below £36m
Outsourced Catering Services	Framework	Chartwells	above £36m (Group: £31.3bn)
Planned Preventative Maintenance Services for Kitchen Appliances	Open	Lorne Stewart	above £36m (£118.7m)
Refurbishment Works for Toilets	Open	Brecongate	below £36m

The College will seek to raise awareness of modern slavery and human trafficking considerations within specific procurement categories. These considerations will then form part of the supplier selection process for goods, works and services in these categories.

During 2023/24 the college employed the services of Crescent Procurement Consortium (formally known as Tenet Education Services Ltd), a procurement company which specialises in providing procurement consultancy services to the education sector, to review spend and complete a selection of tenders on the college's behalf. Prior to any award of tender the preferred supplier will be questioned regarding its compliance with the Modern Slavery Act and the policies and procedures it has in place to combat this practice. If the supplier is non-compliant with the Act then CPC will work with them to ensure compliancy before the contract or tender is awarded.

Suppliers who are identified as being in the higher-risk areas will be asked to commit to the ETI Base Code | Ethical Trading Initiative (ETI) and the College will be working to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;

- Working hours are not excessive;
- No discrimination is practiced;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

Review

No reports were received from employees, learners, the public or law enforcement agencies to indicate that modern slavery practices had been identified in our business or supply chain.

Approval

This Statement has been approved and published by the College Corporation Board and will be reviewed annually and updated accordingly.

This statement will be made available to all staff members, stakeholders and the general public by publication on the College website.

This statement was approved by the Corporation Board on 16th December 2024.

Signed:



J Morgan
Principal

Signed:



P Smart
Chair of Governors