Modern Slavery Statement 2021-22

Modern Slavery policy statement

Student Loans Company Limited ("SLC") is committed to the highest level of ethical standards and has a zero-tolerance policy towards modern slavery and human trafficking. We are committed to acting ethically and with integrity in all business dealings and to taking steps to ensure that modern slavery and human trafficking does not exist in any part of our business or supply chains, and to continually improving our practices to combat these crimes.

An overview of our business

SLC is a Government funded non-profit making organisation set up in 1989 to provide loans and grants to students in universities and colleges in the UK. SLC is a limited company and an Executive Non-Departmental Public Body owned by the Secretary of State for Education, the Scottish Ministers, the Welsh Ministers and the Minister for the Economy, Northern Ireland. SLC plays a central role in supporting the Higher Education (HE) and Further Education (FE) sectors by: making timely and accurate payments of maintenance grants and loans to learners; and ensuring timely and accurate payments of tuition fee loans to HE and FE providers. We also work in partnership with HM Revenue and Customs to collect repayments, as well as collecting repayments directly from some customers. We are located at four sites across the UK in Glasgow, Darlington and Llandudno Junction, and employ roughly 3,300 employees. More information about SLC can be found at www.gov.uk/government/organisations/student-loans-company/about.

An overview of our supply chain

SLC purchases a range of goods and services with third party suppliers, in excess of £140 million per annum, in line with the legal framework which governs public procurement. We will often use public sector framework agreements to contract with suppliers, such as the Crown Commercial Services framework, or the Scottish Government framework. SLC had a supplier footprint of *c*350 suppliers in the 2021-22 financial year, most of whom we have a long-term relationship with. We have 6 broad categories which cover the bulk of our supply chain:

- business support suppliers
- property and facilities management suppliers
- people and professional services suppliers
- ICT – software suppliers
- ICT – hardware and telecoms suppliers, and
- ICT - IT services.

Due diligence process, risk assessment and prevention

Overall, the nature of SLC's business means that the risk of modern slavery and human trafficking in our directly managed business activities and the first line of our supply chain is relatively low. We continue to

review our operations to identify areas where there could be a risk of modern slavery within our business or supply chain and consider what policies and safeguards we have in place to prevent this.

All SLC employees work in the UK, and our recruitment processes are designed and managed to ensure that all prospective employees are legally entitled to work in the UK. Via the Baseline Personnel Security Standard process, all employees are required to undertake right to work, referencing and criminal conviction checks to ensure a consistent and compliant approach. We are committed to upholding the highest standard of employment practices. SLC also recognises one of the largest trade unions in the UK, PCS, in respect of its staff. We have been an Investors in People organisation since 2000 and are committed to ensuring all our people processes and practices meet their standards.

Due to the robust compliance controls SLC has in place, we believe that the risk of modern slavery in our supply chain is relatively low. However, SLC recognises the potential risks inherent in the supply chain of goods and services and is committed to upholding the Chartered Institute of Procurement and Supply ("CIPS") Ethical Code of Conduct, which requires due diligence to be undertaken on appropriate supplier relationships in relation to forced labour and other human rights abuses. Members of our Commercial Services team are members of CIPS. The institute has launched an annual Ethical Procurement Training and Certification module, which demonstrates members absolute commitment to, and understanding of, acting ethically on behalf of their organisation. As this training is optional, we encourage all staff who are members of CIPS to complete the annual training and a test on ethical procurement.

In addition, key commercial documents reflect the SLC Modern Slavery Statement and ensure greater focus on modern slavery during key procurement processes, particularly at procurement strategy stage. In SLC invitations to tender, potential suppliers must declare that they, and any sub-contractors, are compliant with the Modern Slavery Act 2015, they will implement appropriate controls to prevent modern slavery, and will notify SLC immediately if they become aware of any instances of modern slavery within their own business or supply chain. Modern Slavery risk in relevant existing contracts is assessed using the Modern Slavery Prioritisation Tool with findings captured within the Commercial Risk Profile and re-assessed on an annual basis.

In the 2021-22 financial year, SLC reviewed and updated our standard contract terms with suppliers to enhance modern slavery compliance and our ability to trace supply chains. Suppliers will now be required to implement due diligence procedures in their own supply chains and report any incidences of actual or suspected modern slavery in its own business or supply chain to SLC. SLC standard contract terms continue to give us the right to terminate a contract with immediate effect if a supplier is found to be deliberately using or otherwise benefitting from modern slavery, and to oblige any supplier using a sub-contractor, or other third party, practicing modern slavery or benefitting from it, to immediately cancel that sub-contract. If SLC were to become aware of modern slavery or human trafficking in the business or supply chain of any of its suppliers, we would review our rights, with legal support, to cancel the relevant contract/s and notify the appropriate authorities.

Policies relating to modern slavery and human trafficking

In addition to this Statement, SLC has certain policies and procedures in place which contribute to meeting the requirements of the Modern Slavery Act 2015 and preventing slavery and human trafficking in our business and supply chains. All policies are reviewed periodically to ensure they remain current and relevant. Staff policies are easily accessible by all employees and are regularly highlighted and promoted through internal staff communications.

SLC have Recruitment and Selection and Personnel Security Policies, promoting a transparent recruitment process which, in particular, ensures that all prospective employees have the right to work in the UK, their identities are verified, and each individual is properly vetted. All roles are subject to job evaluation, and rates of pay are set in accordance with a clear and transparent grading structure.

Should a member of staff have a concern related to modern slavery, it could be raised either through our Grievance Policy or Whistleblowing Policy. All staff policies are regularly monitored and upheld by SLC's People (HR) department.

We consider that all of these processes and procedures operate together as proportionate safeguards against the risk of modern slavery occurring within our own business and supply chains. Any concerns raised will be fully investigated and appropriate remedial action taken. In the 2021-22 financial year, there were no complaints raised or incidents of modern slavery uncovered.

Further steps

SLC is committed to continually seeking a full understanding of our supply chains and maintaining transparency and responsibility towards people working within them. During 2022-23, SLC will continue to promote staff awareness of the Modern Slavery Act 2015 and consider any training needs for relevant staff in respect of the requirements of the Act. SLC's suppliers will continue to be assessed for modern slavery related risks at the point of contract award, and our top tiered suppliers on an annual basis thereafter, with findings reflected in the Commercial Risk Profile. Where any potential risks are identified, we will work with suppliers to undertake a full modern slavery assessment.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by SLC in the financial year 2021-22 to combat modern slavery.



Paula Sussex, Chief Executive Officer
Student Loans Company Limited

This statement was approved by the Board of SLC on 28 July 2022