

To: SMT
From: Chief Operating Officer
Date: 2 September 2024
Title: Modern Slavery and Human Trafficking Statement

Purpose of report

SMT is asked to endorse the Modern Slavery and Human Trafficking Statement for Corporation Board approval.

Strategic Goal Alignment

- 6. To develop and maintain a stable, financially robust and well-run organisation.
- 8. To provide system leadership to support a strong economy and thriving community.

Implications

Learning, teaching and assessment

Staffing

Budget/Resources – Failure to comply may introduce financial risk

Health and Safety

Equality of opportunity – failure to comply will potentially introduce equal opportunities risk

Risk - failure to comply with legislation will attract financial and reputational risk

Summary of key points

- Commercial organisations are legally required to publish, in a prominent place e.g. website homepage, an annual Modern Slavery Statement, within 6 months of their financial year end, if the following criteria are met
 - it is a 'body corporate' or a partnership, wherever incorporated or formed
 - it carries on a business, or part of a business, in the UK
 - it supplies goods or services
 - it has an annual turnover of £36 million or more
- B&FC meet these criteria and therefore a statement must be published each year
- The statement must cover the following 6 areas
 1. Organisation structure and supply chains
 2. Policies in relation to slavery and human trafficking
 3. Due diligence processes
 4. Risk assessment and management
 5. Key performance indicators to measure effectiveness of steps being taken
 6. Training on modern slavery and trafficking
- The statement is being brought to SMT to request endorsement, prior to review and ultimate approval by the Corporation Board.
- The statement should be signed off by a director and the details of that Director reflected within the statement. For the purposes of B&FC this is the Chair of the Corporation Board.
- The full statement is attached for review and approval.

Modern Slavery and Human Trafficking Statement

1. Introduction

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Blackpool and The Fylde College's (B&FC) slavery and human trafficking statement for the financial year ending 31 July 2025. It includes information about B&FC, its own operations and supply chains, and how it is approaching the eradication of slavery and human trafficking within its business.
- 1.2 B&FC 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 B&FC is taking, and intends to take, to avoid the risk of modern slavery occurring within its services.

2. B&FC's commitment

B&FC is committed to preventing and mitigating exploitation, bribery and corruption. It will not accept modern slavery, forced labour and human trafficking anywhere within its operations or supply chain.

3. Organisational structure

- 3.1 B&FC is a further education College that employs approximately 1,000 staff operating in the United Kingdom. Its core business is educating a population of approximately 13,000 students.
- 3.2 B&FC has normal annual turnover of c £55m of which approximately £18m is spent on goods and services to support the running of the organisation.

4. Due diligence processes

- 4.1 As part of its initiative to identify and mitigate the risks of modern slavery occurring in any part of its services, B&FC 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.
- 4.2 B&FC has in place systems to:
- Take reasonable steps to identify and assess the potential risk areas in its supply chains
 - Mitigate the risk of slavery and human trafficking occurring in its supply chains
 - Monitor potential risk areas in its supply chains
 - Public Interest Disclosure
- 4.3 B&FC identifies the following as the principal areas of potential risk:
- Estates
 - IT
 - Outsourced activities
 - Recruitment agencies

5. Supply chains

- 5.1 In its supply chains, B&FC has identified the following business areas as carrying risks of modern slavery occurring:
- Estates
 - IT equipment
 - Office and general administration equipment
- 5.2 As part of its approach to maintaining a supply chain that is free of modern slavery, forced labour and human trafficking, B&FC requires all commercial organisations with an annual turnover over £36m bidding for B&FC work to provide a copy or link to their anti-slavery statement.
- 5.3 40% of our expenditure in these higher risk areas is under Public Sector Framework Agreements. These agreements are managed by recognised purchasing consortia who each have their own anti-slavery policies. Many Framework suppliers have signed up to the Base code of the Ethical Trading Initiative (ETI), a code of good labour practice set out by the International Labour Organisation (ILO).
- 5.4 Where such a statement does not exist, for example, where the bidder does not meet the Act's criteria for a statement to be produced, B&FC requires a statement from the bidder confirming that it is committed to and acts according to the moral principles of the Act.
- 5.5 Through its standard contract, B&FC requires suppliers to report any breach or suspected breach of the Act associated with its contract to B&FC immediately.
- 5.6 B&FC reserves its rights to terminate contracts with suppliers in the event there is evidence of non-compliance with the Act.
- 5.7 In terms of future steps, B&FC will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and business, B&FC provide training to employees. B&FC also requires its business partners to provide training to their employees, suppliers and providers.

7. Recruitment practices

- 7.1 Employees recruited indirectly by B&FC are recruited through preferred, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, B&FC conducts checks on such agencies before they are approved.
- 7.2 Through its recruitment processes, B&FC ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

8. B&FC policies

- 8.1 B&FC already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of its business. B&FC operates the following policies:
- 8.1.1 Employee Public Interest Disclosure Policy this policy allows employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
 - 8.1.2 Employee Professional Boundaries (Code of Conduct) – this code sets out the actions and behaviour expected of them whilst employed by B&FC. B&FC strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain
 - 8.1.3 Counter Fraud, Bribery & Corruption Policy - B&FC is committed to the highest standards of ethical conduct and integrity in its business activities. B&FC will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf
 - 8.1.4 Sustainable and Ethical Procurement – B&FC has an Ethical and Sustainable Procurement Policy which is applicable to all B&FC employees and Student Union members making procurement decisions. B&FC suppliers will be required to demonstrate the adoption of sustainable and ethical procurement practices when providing goods or services on behalf of B&FC. B&FC also follows the Ethical and Sustainable Procurement guidance issued by the Chartered Institute of Procurement & Supply (CIPS): [Here](#)
 - 8.1.5 Recruitment policy – this policy ensures that B&FC follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

9 Performance indicators

- 9.1 B&FC will on an annual basis monitor the following:
- Concerns raised by colleagues through the Employee Public Interest Disclosure Policy about instances of modern slavery.
 - Deliver annual training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action.
 - Monitor third-party suppliers of relevant goods and services supply chains for incidence of Modern Slavery and trafficking.
- 9.2 This statement will be made available to all, employees, stakeholders and the general public by publication on the B&FC website. B&FC will also seek to raise awareness of the risks of modern slavery amongst its employees by other measures, including discussion of this statement during the induction process for new employees.
- 9.3 Having assessed the training needs for all employees across B&FC, training plans will be implemented as appropriate to the needs of the relevant employee groups.

This statement has been endorsed by the B&FC Strategic Management Team and approved by the Corporation Board. It will be reviewed annually.

Endorsed by B&FC Strategic Management Team xxxxx

Approved by B&FC Corporation Board

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Signed for and on behalf of the B&FC Corporation Board

Name: Steve Fogg

Job Title: Chair

Date: xxxxx