

Slavery and Human Trafficking Statement

Overview

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations came into effect on 29th October 2015 and require commercial organisations in any sector with a turnover greater than £36m per annum to produce a ‘Slavery and Human Trafficking Statement’ for each financial year.

A ‘commercial organisation’ is ‘an organisation which supplies goods and services’.

Turnover is calculated including subsidiaries, but subsidiaries with turnover below £36m per annum or which are not ‘commercial’ organisations do not need to publish a ‘Slavery and Human Trafficking Statement’ in their own name.

If an organisation to which the requirement applies fails to produce a Slavery and Human Trafficking Statement for a particular financial year, the Secretary of State may bring proceedings in the High Court requiring the organisation to do so.

Introduction

This statement sets out New City College’s actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1st August 2016 to 31st July 2017.

As part of the Further Education Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

New City College is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of New City College, a General Further Education College that operates in Central London, providing education and training and has five trading subsidiary companies namely View Training Limited, City Edge Limited, Shoreditch Community Sports Centre Limited, The Trading Company(Hackney) Limited and Towerskills Recruitment Services Limited.

New City College has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning and transport.

New City College only operates in the United Kingdom and has a turnover of £56.4m in 2016 /2017.

New City College is aware of its responsibility under the Act, and is developing its framework to ensure its supply chain complies with the act, and this will include policies, risk assessment, due diligence and training requirements.

Relevant Policies

New City College has a number of policies that assist in preventing slavery and human trafficking in its operations, including:

- **Public Interest Disclosure Procedure (*Whistleblowing Procedure*)**

New City College encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the

organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Code of Conduct**

New City College's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.

- **Supplier Terms & Conditions**

New City College is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its Terms & Conditions was commenced in 2016/2017 and will be completed in 2017/2018 to ensure that suppliers are aware of their obligations under the Act and comply where necessary.

- **Staffing and Recruitment Appointment Policy and Guidelines**

New City College uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence New City College undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

Work in 2016/2017 included changes to the New Supplier Application Form so that suppliers can provide evidence that the organisation complies with the Act, and thereby the College can seek assurance.

Further work will include an analysis of the current suppliers who meet the turnover criteria, and for these organisations, a system will be put in place to gain assurance that the organisation complies with the Act or is working toward compliance, and thereby the College can seek assurance.

All contracts with suppliers, sub-contractors and partners will include reference to the requirements as follows:

“The supplier/subcontractor/partner represents and warrants that neither the supplier/subcontractor/partner nor any of its officers or employees:

- a) has been convicted of any offence involving slavery or human trafficking; and
- b) having made reasonable enquiries, so far as it is aware has been or is the subject of any investigation, inquiry or proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery or human trafficking

The supplier/subcontractor/partner shall implement due diligence procedures for its own suppliers, subcontractors and other participants in its supply chains to ensure that there is no slavery or human trafficking in its supply chains

The supplier/subcontractor/partner undertakes not to purchase any products from producers using forced labour in their operations.

The supplier/subcontractor/partner will notify the College as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this Agreement.”

Additionally, through the College procurement activities, future tender documents will include a supplier Suitability Assessment Questionnaire to seek assurance before entering into new contracts.

Training

New City College will ensure that key staff will undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

Awareness Raising Programme

New City College will continue to raise awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employees can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues.
- What external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by New City College’s Governing Body on 28 February 2017 and will be reviewed and updated annually as part of the review of Financial Statements.