



Modern Slavery Act Statement 2020

Introduction

At New City College (NCC) we are committed to protecting and respecting human rights and have zero tolerance approach to slavery and human trafficking in all its forms. This statement is made pursuant to the requirements of Part 6 of the Modern Slavery Act 2015 and sets out the steps the college has taken and will continue to take in relation to slavery and human trafficking.

This statement sets out the steps taken by NCC in the financial year 2019/20 to try and prevent forced labour and slavery in our supply chain, our own operations and through involvement with our stakeholders. In line with guidance we aim to make progress over a period of time across a broader range of potential exposures, while in this year's reporting set out the steps which have been our first priority under this new legislation.

NCC is a General Further Education College established in April 2017, comprising of the six colleges, Tower Hamlets College, Hackney Community College, Redbridge College, Epping Forest College and the Havering Colleges, and two subsidiary companies OKN1 Limited and New City Fitness Limited. NCC is an FE College operating in East London with an annual income in excess of £95 million, working with over 23,000 students a year, and employs over 1,300 staff. On the 1 August 2019 the two Havering Colleges (Havering College of F&HE and Havering Sixth Form joined the Group).

Our Commitment

NCC has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning and transport. NCC only operates in the United Kingdom delivering a turnover of £95 million in 2019/20.

NCC continues to enhance the framework to ensure its supply chain complies with the act, and this include policies, risk assessments, due diligence and training for relevant staff to ensure compliance with the Act. NCC has a number of policies that assist in preventing slavery and human trafficking in its operations.

Public Interest Disclosure Procedure (*Whistleblowing Procedure*) - NCC encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the College. The Whistleblowing Procedure is designed to make it easy for workers or other stakeholders to make disclosures, without fear of retaliation.

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

Supplier Terms & Conditions - NCC is committed to ensuring that its suppliers adhere to the highest standards of ethics. The Terms & Conditions adopted by the College ensure that suppliers are aware of their obligations under the Act and comply where necessary. The College will continue to review all contracts to ensure compliance.

Potential risk areas in our supply chain – NCC will continue high risk areas, for which the supplier’s Modern Slavery statement is reviewed and all new suppliers make a declaration of their awareness and adherence to the Modern Slavery Act. NCC will continue to get a better understanding of the supply chain, and will monitor those supply chains that have been identified as a potential risk and take appropriate action where necessary. Compliance to the Act is incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of NCC’s terms and conditions. NCC will continue to risk assess the supplier base, to target the awareness and adherence of the Act.

Use of Purchasing Consortiums – NCC works with a number of purchasing consortiums, such as the Crown Commercial Services, all the consortiums used ensure the core principles of the Act are embedded within all supply chain activity.

Sustainability - NCC remains committed to embedding sustainability across all of its activities, and is establishing sustainable strands within all activities, supporting principles of fair trade wherever possible within NCC’s supply chain. NCC will continue to further promote Fairtrade principles wherever feasible in the acquisition and use of resources.

Staffing and Recruitment Appointment Policy and Guidelines - NCC continues to check that our staff have the right to work in the UK, and where agency workers are used, the College engages with agencies that have been through a procurement process prior to appointment to the supplier list to ensure adherence to the Act.

Due Diligence - NCC continues to undertake 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. Further due diligence work is planned based on the risk analysis of the supply chain to gain greater assurance on compliance.

Training and Awareness raising

NCC will continue to ensure that key staff undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate NCC 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.

If on NCC campuses, any alleged violation of the Act, in line with NCC’s policies and procedures, will be investigated and appropriate disciplinary action taken against any member of staff or student. If the violation is within our supply chain, NCC reserves the right to terminate the contract. In most cases NCC seeks to engage, improve, highlight and recognise our responsibility to support the identification, mitigation and eradication of modern slavery in our supply chain or with partners.

Any specific query on the statement should be directed to the procurement team on procurement@nccolondon.ac.uk.

This statement was reviewed and approved by the New City College Corporation for 2019/20 on the 15 December 2020.