

## **MODERN SLAVERY STATEMENT AND POLICY**

Modern slavery is an unquestionable and indefensible violation of an individual's basic Human Rights. South & City College Birmingham recognises that as a public organisation it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all forms.

South & City College Birmingham is working to understand all potential Modern Slavery risks related to its business and is putting in place steps that are aimed at ensuring that there is no slavery or human trafficking related to the college business and our supply chains or in any part of its services. This statement sets out the preventative steps that the college is taking (and intends to take) to avoid the risk of Modern Slavery occurring within the college services.

### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

South & City College Birmingham is a large Further Education College. It delivers education and training to around **14,610** learners annually. The majority of its learners live in Birmingham and Solihull; a small number come from overseas on appropriate visas. South & City College operates in the United Kingdom and in 2021 the college had an annual turnover of **£63,187,000**.

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

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

### **RELEVANT POLICIES**

South & City College Birmingham identifies Modern Slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### ***Procurement/ subcontractors***

South & City College Birmingham is committed to ensuring that its subcontractors and suppliers adhere to the highest standards. All tenders undergo due diligence. Contractors and sub-contractors must confirm that they will meet the Modern Slavery requirements. Further work will be undertaken to ensure all procedures fully meet the requirements of the Act.

#### ***Recruitment and Agency workers***

South & City College Birmingham has established recruitment processes to ensure that comprehensive pre-employment checks take place relating to DBS, Barring List, proof of identity, right to work, references and medical clearance. In addition, the

College ensure that that there is equal pay and a job evaluation scheme to ensure that no member of staff is paid below the minimum wage. Only reputable employment agencies are used and the College always verifies the practices of any new agency it is using before accepting works from that agency

### ***HR Policies***

Clear policies are in place to ensure that staff receive fair treatment from the point of application and throughout their employment. There are policies that enable staff to raise any complaints, grievances or other matters of concern that they have, and the College encourages membership of a trades union who can provide representation, if necessary. Staff also have access to an Employee Assistance Programme and 24 hour helpline

### ***Public Interest and Whistleblowing***

The College encourages all its employees, 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.

### **Learner Support and Safeguarding**

The College also has in place the following policies which are designed to ensure that learners are protected from slavery and human trafficking:

- ***Safeguarding Policy***
- ***Children / Young People / Vulnerable Adults Protection Policy***

All staff and Governors are required to undertake safeguarding training. The College also has in place a dedicated Safeguarding Team and procedures for supporting learners at risk.

### **RISK ASSESSMENT**

The main areas of risk in relation to slavery and human trafficking arise from the following areas:

- Supply of goods and services including through supply chains which may have involved human slavery, trafficking and other forms of exploitation. A review of procurement of goods and services and due diligence to ensure suppliers are not involved with slavery, human trafficking or any other illegal activity, will be put in place.
- Learners studying with the College who may be to subject human slavery, trafficking and other forms of exploitation outside of the College environment. These learners may disclose this information to College staff. The College's safeguarding and reporting process will ensure that where disclosed, such information will be dealt with appropriately and referred as required.

- Staff employed by the College may also be subject to human slavery and other exploitation outside the College. The College's recruitment policies together with its employment policies and processes provide opportunity for this information to be disclosed and for subsequent action to take place, as appropriate.

## **DUE DILIGENCE**

South & City College Birmingham 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.

## **TRAINING AND AWARENESS RAISING PROGRAMME**

South & City College Birmingham will continue to raise awareness of the basic principles of the Modern Slavery Act 2015 and where deemed necessary will engage with external training providers, as appropriate, including but not limited to:

- How employers 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.
- Employees and contractors are encouraged to identify and report any potential breaches of our Modern Slavery Statement.

### **Approval of this Statement:**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

This statement has been approved by the Corporation on 28<sup>th</sup> March 2023, and will be reviewed and updated annually and as part of the review of the Financial Statements.



Chair \_\_\_\_\_

20-04-2023  
Date \_\_\_\_\_



Principal \_\_\_\_\_

20-04-2023  
Date \_\_\_\_\_

## **Approval and Review**

Version: V0.4 Final

Approval: Corporation

Review: 28<sup>th</sup> March 2023

## **Version History**

Version	Description	Approval Date
V0.2	Modern Slavery Statement	30 <sup>th</sup> March 2021
V0.3	Modern Slavery Statement	29 <sup>th</sup> March 2022
V0.4	Modern Slavery Statement	28 <sup>th</sup> March 2023