

# Anti-Slavery and Human Trafficking Policy

Responsible Senior Manager: Clerk to the Corporation

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# 1. Introduction

- 1.1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the College's slavery and human trafficking statement.
- 1.2. HSDC 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 the College intends to take to avoid the risk of modern slavery occurring within College services.

# 2. Organisational structure

- 2.1. The College is a General Further Education Corporation and comprises campuses in Havant, Waterlooville and Alton. The College employs approximately 825 members of staff (625.62 FTE), operating in the United Kingdom. Its core business is teaching a learner population of approximately 8,200 students.
- 2.2. The College has an annual turnover of c£38 million of which approximately £10 million is spent on goods and services to support the running of the College.

# 3. Due Diligence Processes

- 3.1. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of College services, the College 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.
- 3.2. The College has in place systems to:
  - Identify and assess the potential risk areas in our supply chains.
  - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
  - Monitor potential risk areas in our supply chains.
  - Protect whistle blowers.
- 3.3. The College identifies the following as the principal areas of potential risk: Procurement, supply chains, outsourced activities, recruitment practices and recruitment agencies and cleaning and catering suppliers.

# 4. Supply Chains

- 4.1. In its supply chains, the College acknowledges that some business areas carry material risks of modern slavery.
- 4.2. When procuring any types of goods or services, the College requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.

- 4.3. Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the College's own policies and procedures, will be removed from the College's list of suppliers and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.
- 4.4. In terms of future steps, the College will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products

## 5. Training

- 5.1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

## 6. Recruitment Practices

- 6.1. Temporary staff and staff recruited indirectly by the College are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the College conducts checks on such agencies before they are approved.
- 6.2. Through its recruitment processes, the College ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

## 7. College Policies

- 7.1. The College already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of College business. The College operates the following policies:
  - **Grievance and Whistleblowing policies** – These policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
  - **Anti-Bribery and Corruption policy** – The College is committed to the highest standards of ethical conduct and integrity in its business activities. The College will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.
  - **Staff Code of Conduct** – This code sets out the actions and behaviour expected of them whilst employed by the College. The College strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
  - **Procurement Policy** – This policy reflects the College's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

- **Recruitment Policy** – This policy ensures that the College follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 8. Performance Indicators

- 8.1. Where the College has identified risks of modern slavery occurring in any part of its services, it will aim to introduce key performance indicators (KPIs) to measure progress against reducing such risks. The College will consider setting and reviewing KPIs in the following contexts:
  - Use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
  - Training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action.
  - Oversight of third-party suppliers of relevant goods and services supply chains
- 8.2. 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.
- 8.3. Having assessed the training needs for staff operating in different parts of the College, the College will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.