



MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As required by the Modern Slavery Act 2015, this statement sets out Leicester 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 1 August 2019 to 31 July 2020.

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

Leicester College is a Further Education College. It delivers education and training to around 18,000 students annually including training delivered on company premises, apprenticeships and classroom-based activity. The majority of its students live in Leicester and Leicestershire; a small number come from overseas on appropriate visas. Leicester College operates in the United Kingdom and had a turnover of £47.2 million in 2019/20. It moderates some footwear provision delivered by the Central Footwear Training Institute in India (Agra and Chennai).

Leicester College has a supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning and transport. It also has a small number of partners (subcontractors) who deliver education and training on its behalf.

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.

COVID-19

During the COVID-19 pandemic, the College retained close links and communication with the local police and City Council to ensure that any cases of human trafficking or modern slavery could be reported or responded to promptly and support provided for any affected individuals. No such cases were reported in 2019/20.

During the local lockdown in Leicester, significant attention was focussed on poor working conditions in some local factories particularly in the context of how this might have impacted on local infection rates. While the College had no interaction with any

of the businesses identified, it has remained alert to the potential for students and staff to be affected and has continued to monitor and support vulnerable individuals.

RELEVANT POLICIES

Business Operations

Leicester College has a number of policies that assist in preventing slavery, human trafficking and other forms of exploitation in its operations, including:

<ul style="list-style-type: none"> • <i>Subcontracting and Tendering (FF005)</i> • <i>Procurement Strategy</i> • <i>Environmental and Sustainability Policy (EC019)</i> 	<p>Leicester College is committed to ensuring that its subcontractors and suppliers adhere to the highest standards. Further work will continue to be undertaken to ensure all procedures fully meet the requirements of the Act including the development of an updated procurement strategy.</p>
<ul style="list-style-type: none"> • <i>Safeguarding in Recruitment Policy (HR039)</i> • <i>Recruitment and Selection Policy and Procedures (HR027)</i> • <i>References Policy: recruitment of staff (HR030)</i> • <i>Volunteers Procedure (HR037)</i> 	<p>Leicester College 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.</p>
<ul style="list-style-type: none"> • <i>Wellbeing Policy (HR038)</i> • <i>Employee Standards and Code of Code of Conduct (HR000)</i> • <i>Equality and Diversity Policy (SS008)</i> • <i>Religion and Belief Policy (SS019)</i> • <i>Bullying and Harassment Policy (HR010)</i> • <i>Grievance Policy (HR019)</i> 	<p>Clear policies are in place to ensure that staff receive fair treatment from the point of application and throughout their employment. Leicester College's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation. 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.</p>
<ul style="list-style-type: none"> • <i>Public Interest and Whistleblowing (GP006)</i> 	<p>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.</p>

Student Support and Safeguarding

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

<ul style="list-style-type: none">• Safeguarding (SS020)• Children Young People Vulnerable Adults Protection Policy (SS003)	All staff are required to undertake safeguarding training. The College also has in place a dedicated Safeguarding Team and procedures for supporting students at risk.
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The College's safeguarding processes ensure that any concerns relating to exploitation or modern slavery, including referrals from outside the College, are passed promptly to the College's safeguarding team. Members of the team then liaise with any external agencies including social services or the Police where necessary.

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.** To mitigate this risk, the College actively promotes the use of consortia when procuring goods and services, as these already have in place stringent and detailed contracts and due diligence processes to ensure suppliers are not involved with slavery, human trafficking or any other illegal activity. Potential suppliers with whom the College contracts directly are also required to provide evidence of compliance with the requirements of the Modern Slavery Act.
- **Students studying with the College who may be subject human slavery, trafficking and other forms of exploitation outside of the College environment.** These students 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.
- **Training for some sectors which may be deemed to be higher risk specifically the textiles industry.** Any outreach work in textiles companies is organised through Jobcentre Plus and involves only reputable companies. None of the companies highlighted during the year has having poor practices were used.

DUE DILIGENCE AND CONTRACTS

Leicester 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.

Standard contracts include references to modern slavery and require companies to complete modern slavery declarations.

TRAINING AND AWARENESS RAISING PROGRAMME

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

The College will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, 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.

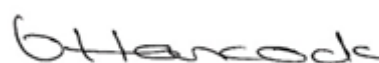
This statement has been approved by Leicester College's Governing Body on 16 December 2020 and will be reviewed and updated annually as part of the review of the Financial Statements.



JONATHAN KERRY

CHAIR

12 December 2020



VERITY HANCOCK

PRINCIPAL/CEO

12 December 2020