

Modern Slavery and Human Trafficking Statement **for year end 31 July 2019**

CIC/RC/19/5/13

Introduction

This statement sets out Colchester Institute's actions to understand all potential modern slavery risks related to its business and the steps that will be put in place to aim 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 2018 to 31st July 2019.

Colchester Institute is absolutely committed to ensuring that there is no modern slavery or human trafficking in its corporate activities, ensuring that its supply chains are free from slavery and human trafficking. All corporate policies issued by the organisation will take due cognisance of, and ensure adherence to, the following provisions:

- Local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibition of any threat of violence, harassment and intimidation
- Prohibition of the use of worker-paid recruitment fees
- Prohibition of compulsory overtime
- Prohibition of child labour
- Prohibition of discrimination
- Prohibition of confiscation of workers original identification documents
- Providing access to remedy, compensation and justice for victims of modern slavery

Organisational structure and supply chains

This statement covers all activities of Colchester Institute:

- Colchester Institute has an annual turnover in the region of £40m and provides education and training programmes for over 10,000 students each year.
- Colchester Institute is a further and higher education college that operates throughout North Essex, the three main sites being at Colchester, Braintree and Clacton.
- A wide variety of technical and professional programmes are offered in a wide range of vocational subject areas.

- A number of support functions (e.g. Human Resources, IT Services, Finance, Estates) support the core business of education and training provision.
- The diverse nature of the College's operations requires the College to work with large number of suppliers. Our aim is to ensure that these, in turn, comply with the modern slavery regulations.

The organisation currently only operates in the United Kingdom. However, we are aware that a number of the organisations in our supply chain may source from outside the United Kingdom.

The following is the process we will be taking to assess whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- All new suppliers will have to complete a registration form in which one section specifically refers to the Modern Slavery Act and how they comply with it.
- All tender exercises now include a clause relating to the Modern Slavery Act and asking them to provide evidence of their compliance and the steps they take to ensure their own supply chain complies.
- With regards to the large number of pre-existing suppliers we will identify suppliers that are most at risk of this, and ones that we will have most influence over, and ask them to also provide evidence of their compliance to the Modern Slavery Act.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Certain service agreements which due to these being outsourced mean that the College does not have direct control over the staff employed and their terms of employment.
- For equipment purchases; certain items such as IT hardware may be considered high risk because of the country in which they may have been manufactured.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** There are a large number of policies and procedural documents within the organisation and these have a wide range of owners. Work is currently underway to centralise and catalogue all policies to make regular updating more straightforward and easier to track. This will enable key policies to be examined quickly for compliance with this statement and the Act.
- **Risk assessments:** As an educational establishment we have a responsibility to ensure that not only are our own employees protected but that our various supply

chains also adhere to the regulations - not just to comply with the Modern Slavery Act but also to set an example for the students to take forward in later life.

Risk assessment of the suppliers will be addressed on two levels. Firstly all supplier organisations will be categorised by the level of risk associated with their sector – as designated by the Government. Secondly, all procurement activity will include questions around compliance with the Modern Slavery Act, with the onus on suppliers to evidence their positive actions to provide safe working conditions and prevent modern slavery.

- **Investigations/due diligence:** In the event of any concerns in this regard relating to members of the College's staff, such concerns must be raised with the Executive Director: Human Resources. In the event of concerns or investigations required relating to suppliers this should be reported to the Procurement Team.
- **Training:** An online course is being created to raise awareness among new and existing staff. Information on this subject will be placed on the College's portal in due course in order to raise staff awareness of their duties and responsibilities in this regard. Staff in critical roles will receive more detailed training and information i.e. within HR, Procurement and Facilities.
- **Purchasing practices:** The college adheres to an open and fair procurement process and is mindful of the profound impact it can have on worker conditions in the supply chain through those purchasing practices. Quality assurance of the product/service along with other factors are measured alongside price to avoid placing pressure on suppliers that could lead to poor recruitment practices, worker conditions and low pay for workers.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy:** The organisation 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. This would include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of negative repercussions.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour wherever and whenever they are going about their work.
- **Supplier/Procurement code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics at each stage of the procurement process. Suppliers are expected to demonstrate that they provide

safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. For all new suppliers part of their registration process will be to confirm they comply with the modern slavery act and if applicable provide a copy of their own statement not only for evidence but to also see if there is best practice that could be shared. To date, there have not been any causes for concern or reports that have led to a need for investigation.

- **Recruitment/Agency workers policy:** The organisation uses only specified, 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

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
- Promoting the benefits of 'freedom of association' to suppliers as good for people, society, business and morale. Workers who combine their interests by approaching their employer together as a group can help to balance the power inherent in any employment relationship. This encourages people to speak their minds without fear of reprisal. The relative security of numbers allows individuals to express themselves more openly and adds to the value of information that is exchanged.
- If using agency-workers, the college ensures that all agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted i.e. to avoid various methods of exploitation such as implementing worker-paid recruitment fees, as a form of debt bondage.
- Using frameworks which have their own Modern Slavery Act statement and ensuring that all future tender exercises include a similar clause so that all suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular i.e. to ensure workers are not trapped in debt by employers for the provision of services provided by the employer, such as accommodation or healthcare.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Requiring all staff to have been made aware of their obligations around modern slavery by July 2019 (this will normally be by reading a summary of these obligations).
- Providing to relevant staff (chiefly finance, procurement and Human Resources) more detailed training in their specific responsibilities.
- Developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they are set up on the finance system.
- Reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

Training and awareness raising

The organisation requires relevant staff within the organisation to know and understand their obligations in this area

The organisation's modern slavery training (for employees in certain roles –e.g. HR, Procurement, and those involved in agreement of third party contracts) covers:

- the College's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as more formal training for specified staff, the organisation will raise awareness of modern slavery issues by circulating information by email or through the Core Brief to all staff. Such communications will explain:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation, and
- what external help is available, for example through the Modern Slavery Helpline.

Corporation Board approval

This statement has been approved by the organisation's Corporation Board, who will ensure that it is reviewed and updated annually.

Chair of the Corporation Board signature:



Chair of the Corporation Board name:

Kevin Prince

Date: 26 November 2019