



Weston College **Group**

**Modern Slavery Statement and Policy 2022**

# Modern Slavery Statement and Policy 2022

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### Change Control

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Version	Type – New/Replacement/Review	Date	History
1.0	New	January 2021	N/a – new policy
2.0	Review	February 2022	Reformatted to new template. Social Value (theme 4 ‘Equal Opportunity’ section added.

This policy applies to Weston College Group and all wholly owned subsidiary companies of the Weston College Corporation which include OLASS, Forward Futures, SOMAX, Releasing New Potential, and Inspirational Events and Investments Ltd.

# Modern Slavery Statement and Policy 2022

## 1 PURPOSE AND SCOPE

This statement is made on behalf of Weston College Group and its subsidiary companies with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains.

This statement and policy is to be reviewed each year in accordance with clause 6 of the Modern Slavery Act 2015. This statement constitutes Weston College's slavery and human trafficking statement for the end of 2021 and applies to Weston College Group and its subsidiaries.

The statement also complies with the Social Value Act 2013, which ensures organisations review the wider social, economic and environmental benefits of public services, including the FE and HE sector.

## 2 POLICY STATEMENT

Weston College is committed to working towards the eradication of slavery and human trafficking. This document acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the organisation is taking to work towards the provision of the Act.

The College is committed to ensuring that there is no slavery or human trafficking in its organisation and supply chains. This policy reflects the College's commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the College's supply chains.

### 2.1 Organisation structure

Weston College provides education to a wide range of learners from age 14 to adult.

The College's subsidiary organisations include;

- Forward Futures - Weston College's recruitment service for education professionals seeking temporary positions at the College
- Offender Learning Services - Since 2012, the College has taught the OLASS 4 contract in prisons across the South West of England. This contract changed in April 2020 to PEF, and now includes prisons in the South East of England.
- Restart - Employment and Training Ltd - Formed for Prison Education in specific partnership with G4S.
- Releasing New Potential - Community Interest Company, which supports and creates opportunities for people who are at risk of re-offending
- SOMAX - Specialising in driver and logistics training across the South West
- Inspirational Events and Investments - Events and facilities management company which includes the Winter Gardens and the Lauriston Hotel
- West of England Institute of Technology Limited - This is the legal entity for the West of England IoT, which includes UWE, Bath College, Gloucestershire College, Yeovil College and 15 employer partners providing Level 4 and 5 education in Advanced Manufacturing and Engineering, Digital Technologies and Health Sciences.

### 2.2 Our supply chains

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The College has a number of suppliers for various parts of the organisation.

These include:

- Agency staff including teaching and business support
- Business partners
- Apprentice employers
- External contractors including advisors, cleaners, builders, caterers and consultants
- Guest speakers and lecturers
- Printing of College promotional materials
- Advertising, including digital and print
- Merchandise
- Photography
- Graphic design
- Sponsorship and charity.

## 2.3 Due diligence processes for slavery and human trafficking

The College is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow College policies. We will expect our suppliers to hold their own suppliers to the same high standards.

All employees and persons employed within the College are asked to familiarise themselves with College policy at the start of their employment or association, and are contractually obligated to adhere to the College's policies.

We are satisfied from our own due diligence measures that there is no evidence of any act of modern day slavery or human trafficking within our own organisation.

The College's supplier approval process incorporates a review of the controls undertaken by the College's potential suppliers.

The College will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking.

The College has a policy of zero-tolerance on matters of slavery and/or human trafficking and expects suppliers and associated businesses to comply with these values.

The vast majority of the College's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues.

The College also has a policy for the protection of whistleblowers, to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.

The steps we will take to further the goals of the Modern Slavery Act 2015 are:

- Conducting risk assessments to determine which parts of the College and its suppliers are most at risk of modern slavery so that efforts can be focussed on those areas
- Engaging with our suppliers to convey to them the College's position on modern slavery and to understand the measures taken to prevent modern slavery in their own businesses
- Seek to introduce additional pre-screening measures for suppliers

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- Introduce contractual provisions for our suppliers to confirm their adherence to College policy
- Publishing this statement and policy on the College's website to clearly display the College's support to end modern slavery.

## 2.4 Social Value Model (Social Value Act 2013) – Theme 4: Equal Opportunity

The College is committed to ensuring that it supports the policy outcome of tackling workforce inequality as stated in the Social Value Model. It is committed to tackling inequality and giving everyone the opportunity to fulfil their potential, all work should be fair and decent and everyone should be able to benefit from high quality jobs.

Activities which are planned and undertaken by the College which demonstrate our ability to identify and manage the risks of modern slavery include:

- Strong understanding of the modern slavery risks and issues affecting the education sector and the workforce at the College and those of our sub-contractors - completed for 2021
- Mapping of our supply chain to provide assurance risks are understood and being managed effectively in relation to vulnerable groups, type of work and location of supply chain - completed for 2021
- All staff and students have access to an independent democratic trade union or other form of worker representation - completed for 2021
- All staff and students have access to grievance mechanisms to report incidents or suspected incidents of modern slavery through whistleblowing and reporting, including:
  - A process of escalation routes and access to grievance systems - completed for 2021
  - An action plan, with past evidence of how the organisation has/will respond including cooperating with police and victim organisations where appropriate - no incidents for 2021
- All staff receive induction on workplace rights - completed for 2021
- Has access to modern slavery training - completed for 2021
- Policies and practices to mitigate modern slavery risks include:
  - Pre-employment checks in line with safer recruitment practices - completed for 2021
  - Recruitment practices and workplace conditions - completed for 2021
  - Safeguarding training, plans and regular monitoring through the Safeguarding and PREVENT committee - completed for 2021
  - Procurement policy which ensures business decisions such as price/cost, short lead times, payment timescales do not create modern slavery risks in the supply chain - completed for 2021
- Partnership working with trade unions and other organisations to address modern slavery risks - completed for 2021
- Influencing activities such as demonstrating leadership and ongoing commitment to the agenda, a nominated lead for accountability regarding modern slavery, partnering/collaborating and opportunities for volunteering activities - completed for 2021

## 3 RESPONSIBILITIES

Ultimate responsibility for the prevention and prevention of modern slavery within the College rests with the College's leadership team. Weston College's Corporation has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations.

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Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## 3.1 Reporting modern slavery within the College or its suppliers

The College's whistleblowing and safeguarding and PREVENT policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the College or its suppliers may be reported by employees in this manner. The aforementioned policies apply to employees and may be found on SharePoint.

To surmise, any suspected instance of modern slavery or human trafficking within the College or its suppliers must be reported to one of the College's designated Safeguarding Officers, who will investigate and advise the appropriate people of any further actions.

The details of Safeguarding Officers are widely available to all staff members and are displayed on the back of staff ID badges, in the display stands at all campuses, and on the College website.

## 3.2 Records management and review

This policy is displayed on the College website and on the College's intranet, the policy location is conveyed to all staff members at their induction.

The Modern Slavery Statement and Policy will be reviewed annually by the College's leadership team in accordance with clause 6 of the Modern Slavery Act 2015