

Modern Slavery and Human Trafficking Statement

Purpose

This statement demonstrates the commitment of North East Scotland College and its subsidiary companies to the principles of the *Modern Slavery Act 2015* and specifically to section 54 (1). This statement will be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

College Policy and Statement

North East Scotland 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. We are committed to ensuring that there is no slavery or human trafficking in our organisation and supply chains. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Organisational Structure and Supply Chains

North East Scotland College is the Regional College for the North East of Scotland, comprising the City of Aberdeen and Aberdeenshire. It provides education to a wide range of learners from age 14 to adult.

The College's subsidiary organisations include: -

- Aberdeen Skills and Enterprise Training Limited, providing specialist training to the Oil and Gas Industry; and
- Clinterty Estates Limited, currently dormant.

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 facilities management, cleaners, construction, and caterers;
- Suppliers of goods, services and materials for teaching and business support;
- Printing of College promotional materials; and
- Advertising, including digital and print.

The College has adopted the Advanced Procurement for Universities and Colleges' (APUC) Sustainable Procurement Code of Conduct and we refer to this in our procurement exercises. The Code has been used in APUC Framework Agreements since its inception in 2013. Through APUC, the College is an associate member of *Electronics Watch* (an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe).

Due Diligence Processes

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 assured through their agreement to follow College policies. We expect our suppliers to hold their own suppliers to the same high standards. 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;
- Introduce additional pre-screening measures for suppliers, where appropriate; and
- Publishing this statement and on the College's website to clearly display the College's support to end modern slavery.

Training, Awareness & Involvement

The College actively engages with the multi-agency Serious and Organised Crime (SOC) group, to assist in promoting best practice and ensuring inter-agency approaches in tackling SOC.

Staff involved in procurement of goods and services attend training on ethical procurement.

The College publishes updates on slavery, human trafficking and ethical procurement on its intranet.

Responsibilities

The Regional Board has overall responsibility for ensuring that this policy statement and its implementation comply with our legal and ethical obligations. At an operational level, responsibility for the prevention of modern slavery within the College and its supply chain rests with the College's Leadership Team. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy statement.

Reporting Modern Slavery within the College or its Suppliers

The College's whistleblowing and safeguarding 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 are published on the College Intranet.

Communication and Awareness

This statement is displayed on the College website and on the College's Intranet, and all staff are required to read and indicate their understanding of it.

The Modern Slavery Statement will be reviewed annually by the College's Senior Executive Team and approved by the Regional Board.