



Anti-Slavery and Human Trafficking Statement

November 2018

1. Introduction

- 1.1 This statement sets out East Sussex College Groups actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the year

starting 1st November 2018 to 31st October 2019. The college group recognises that it has a responsibility to take a robust approach to slavery and human trafficking. NB. The aim of this statement is in line with the Groups own values.

2. Organisational Structure

- 2.1 The college group employs approximately 1500 staff, operating in the United Kingdom. Its core business is teaching a learner population of approximately 15,000 full and part-time students.
- 2.2 The college group has an annual turnover of £52million, of which approximately £24 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 group has adopted due diligence processes that are proportionate to the risk identified and are dependent on the severity of the risk and other relevant factors.
- 3.2 Due diligence is conducted on all suppliers before allowing them to become an approved supplier to the college group. This due diligence includes an online search to ensure that particular organisations have never been convicted of offences relating to modern slavery and, for high risk areas, on site audits to include a review of working conditions. This relates to suppliers of goods and services and, importantly, agency staff.
3. The overriding aim of the due diligence is 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.
- 3.4 These processes are subject to ongoing assessment and review.

4. Supply chains

- 4.1 In its supply chains, the college group has identified the following business areas as carrying material risks of modern slavery occurring:
 - Estates and Facilities.
 - Professional services including outsourcing and franchising arrangements.
 - IT and communications.
 - Catering provision and supply.
 - Agency staff.
2. When procuring any types of goods or services, the college group requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
3. As part of our contract with suppliers we require that they confirm to us that:
 - They have taken steps to eradicate modern slavery within their business.
 - They hold their own suppliers to account over modern slavery.
 - (For UK based suppliers) They pay their employees at least the national minimum wage/national living wage (as appropriate).

4. 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.
5. In terms of future steps, the college group 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 group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the college group conducts pre-qualification checks on such agencies before they are approved.
- 6.2 Through its recruitment processes, the college group 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 group 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 group operates the following policies:

- **Grievance and whistleblowing policies** — The college group encourages all its workers, customers and business partners to report any concerns related to the direct activities, or the supply chains of, the college group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The college group's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.
- **Employee code of conduct** — this code sets out the actions and behaviour expected of them whilst employed by the college group. The college group strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Financial regulations/anti-bribery and corruption policy** - the college group is committed to the highest standards of ethical conduct and integrity in its business activities. The college group will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.
- **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.

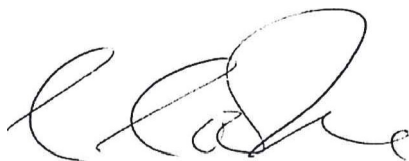
- **Recruitment policy** - this policy ensures that the college group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

8. Performance indicators

8.1 Where the college group has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The college group will consider setting and reviewing KPIs in the following contexts:

- All staff to have completed training on modern slavery by 1st April 2019.
 - Percentage of high risk contractors/supply chains reviewed each year.
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.
 3. This statement has been approved by the college's senior management team and will be reviewed at least once annually.

Signed:

A handwritten signature in black ink, appearing to read 'Clive Cooke', written in a cursive style.

Clive Cooke
CEO
East Sussex College Group

