



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **OVERVIEW**

Gateshead College believes in the purpose and principles of the Modern Slavery Act 2015 (“the Act”), and this statement sets out the steps we have taken to ensure there is no modern slavery and human trafficking in Gateshead College and its supply chains. We are committed to running our business responsibly and in accordance with our core values.

This statement refers to the financial year ending 31 July 2021

### **OUR COMMITMENT**

We adopt a zero-tolerance approach to slavery and human trafficking and are committed to protecting human rights. We comply with all laws, rules and regulations relevant to our organisation and we will act ethically and responsibly in all our relationships by working with suppliers that share and adhere to this commitment. We will also put in place reasonable measures to ensure that slavery and human trafficking does not occur within our own organisation or our supply chains.

### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

Our statement covers the activities of Gateshead College, a General Further Education College which operates in the North East of England, providing education and training.

Gateshead College has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning, printing and transport.

The College is aware of its responsibility under the Act. Not only do we ensure that modern slavery is not taking place within Gateshead College, we also work to ensure it is not occurring within our supply chains. It is a condition of all contractor, customer, supply and vendor contracts entered into with Gateshead College that the principles set out in this Statement are adhered to.

As a basic principle, all contractor, customer, supply and vendors must comply with all applicable laws, including but not limited to employment, human rights, the environment and health and safety.

### **RELEVANT POLICIES**

We have a number of policies that assist in preventing modern slavery and human trafficking in its operations, including:

➤ **Public Interest Disclosure Procedure (*Whistleblowing Procedure*)**

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Public Interest Disclosure Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.



➤ **Behaviour Framework**

Our Behaviour framework makes it clear to employees the actions and behaviour expected of them when representing the organisation.

➤ **Supplier Terms & Conditions**

We are committed to ensuring that our suppliers adhere to the highest standards of ethics to ensure suppliers are aware of their obligations under the Act and comply where necessary.

## **OUR PEOPLE**

We have put in place the following measures to mitigate the risk of slavery or human trafficking taking place directly within our College:

➤ **Recruitment Practices**

We carry out rigorous right to work checks for all new employees. When it is necessary to engage agency workers, we use only vetted and approved recruitment agencies.

➤ **Pay**

We comply with all pay related legislation.

➤ **Working Conditions**

Our Health and Safety Team oversee our compliance with health and safety legislation across our campuses. We are committed to fair working practices and publish a range of policies and procedures setting out our approach to health and safety, well-being at work and family friendly arrangements.

➤ **Whistleblowing**

All employees are encouraged to raise concerns about possible wrongdoing or malpractice within the College and will be protected from any reprisals should they choose to make such a disclosure. This commitment is set out in the College's Public Interest Disclosure Policy.

## **DUE DILIGENCE**

We undertake appropriate due diligence checks when considering taking on new suppliers to ensure they meet their regulatory obligations.

All new Suppliers declare that their organisation complies with the Act. All suppliers (including their sub-contractors/supply chain) are also expected to:

- have management systems in place for delivering and monitoring contractual compliance in line with the due diligence responses for their own operations and those of their sub-contractors.
- comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation conventions.
- communicate their expectations for compliance on all the issues raised within the due diligence responses to all of their relevant employees and sub-contractors / supply chain.



Additionally, through the College's procurement activities, tender documents include a supplier Suitability Assessment Questionnaire to seek assurance before entering into new contracts. Our due diligence seeks to assess whether the supplier:

- has policies, processes and procedures in place relating to anti-slavery and unfair practices;
- operates using fair employment practices such as offering overtime on a voluntary basis;
- has taken steps to ensure that slavery and trafficking does not exist anywhere their entire supply chain; and
- has systems in place to ensure compliance with the Act.
- Requiring suppliers immediately report to the College any breach of or deviation from our Anti-Slavery Policy;
- Obtaining a contractual right to request from the supplier or contractor a corrective action plan. This plan is to set out the steps that the supplier or contractor will undertake to rectify the breach. Should the corrective action plan not rectify the breach and depending on the severity of the breach, the College reserves the right to terminate any contractual relationship that exists.

### **AWARENESS RAISING**

Gateshead College will continue to raise the awareness of the basic principles of the Act, through our procurement processes.

### **SUMMARY**

This statement has been approved by our Governing Body at the Board Meeting in December 2021 and will be reviewed and updated annually as part of the review of the Financial Statements.

David Alexander  
Principal and Chief Executive