

Modern Slavery Act 2015 Statement

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Introduction

This statement sets out the actions taken by St Helens College to understand all potential modern slavery risks related to its business and the steps taken by the College aimed at ensuring that there is no slavery or human trafficking in its own business or supply chains.

As a responsible, and ethical educational establishment, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The College has a zero-tolerance approach to any form of non-ethical practices. The College is committed to acting ethically and preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement is made in connection with Section 54 of the UK Modern Slavery Act 2015 in respect of the financial year ended 31 July 2023.

Organisation Structure and supply chains

The College has an annual turnover in excess of the statutory minimum threshold of £36m and therefore has a statutory obligation to publish a 'Modern Slavery and Human Trafficking Statement'.

St Helens College is one of the largest colleges in the Northwest with a broad and inclusive curriculum and four campuses based in the heart of St Helens and Knowsley. The College has over 500 employees across five campuses in the Northwest of England.

The supply chain structure for the group, has the following categories of spend: estates, capital works, IT, professional services, recruitment, marketing, catering and office supplies, security services and sub-contract providers.

Organisation practices, policies and procedures

The College is committed to continuously reviewing and improving its corporate practices, including its operational procedures and supply chain to ensure that it is compliant with all applicable laws and regulations pertaining to the UK Modern Slavery Act 2015.

The College recognises that although slavery, servitude, forced and compulsory labour and human trafficking (collectively 'Modern Slavery'), is illegal, it remains a growing issue in the UK. The College also recognises that all organisations have a responsibility to assess, and endeavours to minimise the risk of modern slavery and human trafficking within the organisation and its chains.

The College's Core Values include Respect, Trust and Care. Several of its existing policies reflect its commitment to act with respect in all of its interactions and to minimise the risk of modern slavery within the organisation and wider supply chain. All academic staff sign up to a Code of Conduct. College employees are accountable for compliance with company policies and procedures which includes a requirement to ensure the College operates in compliance with the law.

Management

The College will not tolerate human trafficking, forced labour, unlawful child labour, commercial sex acts or other unethical or illegal labour practices by its employees, agents, providers or subcontractors anywhere in its supply chain. This statement applies to all employees, subcontractors, subcontractor employees and agents. Any employee or subcontractor who is found to have contravened this policy will be subject to remedial action: if an employee, this will involve disciplinary action including the possibility of dismissal; if a subcontractor or agent, action will include contract termination. If the College believes that there has been an unlawful act, the matter will be referred to the police. The College employs all its workforce directly and only occasionally engages independent agents or contractors to work at the College. Most of its employees are permanent. The College's Right to Work Policy and Recruitment Policy are followed to ensure, as far as possible, that migrant workers are not exposed to exploitation and that the organisation is not exposed to the fraudulent recruitment of employees. Due to the nature of the organisation, there are stringent Safer Recruitment procedures and the requirement to have resided in the UK for at least 5 years prior to accepting an offer of employment, which minimise the risk of modern slavery practices. The College has contractual relationships with all of its suppliers and is reviewing current contracts to ensure that they take account of Modern Slavery Act 2015 and that suppliers must be compliant and in addition, making contact with the supply chain to confirm their adherence.

Supply Chain

The College subcontracts general maintenance and construction works services to a number of small providers in the UK and is committed to working with suppliers to ensure that they are compliant with Modern Slavery Act 2015. The College is committed to ensuring that it is not supplied by anyone who engages in human trafficking and modern slavery. College standard terms of procurement require suppliers to comply with all applicable laws in the provision of products and services to the College. The College typically reserves the right to conduct supplier audits to underpin this requirement. Employees are required to report any activity suspected to involve Human Trafficking, Forced Labour, Unlawful Child Labour, or Commercial Sex Acts or any activity inconsistent with this Policy, or applicable laws committed against themselves or others, including any contracted staff.

Reporting of slavery and human trafficking

Employees may report suspected activity without fear of retaliation directly to their line manager or supervisor, a member of the People Team or any member of the Senior Management Team.

Training and education on modern slavery and trafficking

The College is committed to informing and training all staff, workers and contractors in modern slavery through its mandatory training programme.

The future

The College is not aware of any established instance of modern slavery within the organisation or wider supply chain. As a public sector organisation, the College recognises its responsibility to embed social value into its corporate activities. The College remains committed to introducing standard policies and procedures, which highlight and educate employees and suppliers of the risk of modern slavery. As such, identification and management of modern slavery risk will continue to inform the update of college compliance processes and policies. The College is committed to making further improvements to eradicate modern slavery and human trafficking.

This statement has been approved by the Senior Leadership Team and the Board of Governors.