



## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement sets out City College Norwich's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year (1 August 2021 to 31 July 2022).

As part of the education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

City College Norwich is aware that following a public consultation seeking views on a range of measures designed to strengthen the transparency in supply chains provisions contained in section 54 of the Modern Slavery Act 2015 ("The Act"), the Government has committed to amend the legislation. The College welcomes further guidance and amendments to the Modern Slavery Act and will review its Modern Slavery Statement once the amendments have been implemented, in order to continue to raise the organisation's standard and approach to preventing slavery and human trafficking within its supply chains and to comply with these measures.

### **Organisational Structure and Supply Chains**

This statement covers the activities of City College Norwich, which includes Paston College and Easton College, and its subsidiaries; Norfolk Educational Services (Company number 08070455), EOC Enterprises Ltd (Company number 02908222) and EOC SPV Limited (Company number 08850415).

City College Norwich is a leading provider of higher, further and community education for the eastern region of the United Kingdom. With a turnover of £55 million and over 8,000 students, City College Norwich has established a reputation for the last 125 years for excellence in academic standards, as well as innovations in operational and strategic direction. The College provides excellent preparation for students' career development and progression. All courses have strong links with employers and the world of work, meaning that the vocational skills and knowledge that are developed with us are up-to-date, relevant and in demand from employers. The College has extensive links with employers across all of its curriculum areas and continually updates its courses to take account of the current and future higher skills needed by employers.

The College's supply chain is made up of a number of third party providers, many of which are procured through a recognised consortium for the education sector. The College procures

a varied range of items to support educational activity – from text books to bricks. The College also procures a range of services such as cleaning and catering.

The College adopts a zero-tolerance approach to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our direct activity or in our supply chains.

City College Norwich currently operates only in the United Kingdom.

The following is the process by which the organisation assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

1. The College was a Living Wage employer, until November 2022.
2. We have in place robust policies for Whistleblowing, Grievance and Dignity at Work and staff are aware of how to raise concerns in relation to any perceived wrongdoing or poor practices in the College.
3. We have a thorough procurement process and adhere to the Public Procurement Regulations 2020.
4. All staff employed directly by the College or through contractors are subject to stringent pre-employment checks before they are able to undertake work for us.
5. The College will ensure that key staff undertake training on modern slavery, where deemed necessary.

### Supply Chain Management

The College sources a wide range of goods and services from suppliers based in the United Kingdom.

In all of its dealings with those suppliers the College strives to ensure that the highest ethical standards are reached at all times. As part of this ongoing requirement, there will be increased focus on the requirement for a long-term commitment by those suppliers to eradicate slavery and human trafficking in their own businesses and supply chains.

### Internal Auditing

An internal audit of the College's procurement processes has presented us with no immediate concerns. The vast majority of those suppliers are local to the College and therefore pose minimal risk in terms of non-compliance with the Act.

### Responsibility

Responsibility for the College's anti-slavery initiatives is as follows:

**Policies:** The Information Compliance and Policies Officer is responsible for putting in place and reviewing policies and the process by which they were developed.

**Risk Assessments:** The College has a consistent approach to undertaking risk assessments and the Director of Governance and Legal is responsible for undertaking the human rights and modern slavery risk analysis.

**Training:** All staff who have responsibility for purchasing or authorising purchasing activity have undertaken training on modern slavery, where deemed necessary and are familiar with the relevant policies, set out below.

### Relevant Policies

The College operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The College encourages all its employees and contractors to report any concerns related to the direct activities of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear or retaliation.
- **Employee Code of Conduct:** The College's code makes it clear to employees the actions and behaviour expected of them when representing the organisation and working with students. The College strives to maintain the highest standards of employee conduct and ethical behaviour.
- **Procurement Policy:** The College is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its Terms & Conditions will be undertaken to ensure that existing suppliers are aware of their obligations under the Act and comply where necessary. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. All new suppliers will be vetted for compliance with the Act as part of the due diligence process. Any supplier or potential supplier, that does not comply with the Modern Slavery Act 2015 will be removed from the College's list of suppliers and will be excluded from any procurement process.
- **Recruitment and Selection Policy:** The College uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Any member of staff recruited through an agency will be subject to the full pre-employment checks required by the College before they can commence any work with the College.
- **The College Financial Regulations:** The College Financial Regulations clearly state the requirements and process to be followed when entering into any agreement with suppliers.

You can view these policies at <https://www.ccn.ac.uk/our-college/city-college-norwich-corporation-and-governance/city-college-norwich-corporation-documents/policies-and-procedures/>

## **Due Diligence**

The College undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The College's due diligence and reviews include:

- seeking confirmation from any potential supplier in the Standard Selection Questionnaire or Invitation to Tender document as to whether they are:
  - A relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015 ("The Act")?
  - If so, whether they are compliant with the annual reporting requirements contained within section 54 of The Act?

If they are not compliant with section 54 of The Act, the potential supplier will be excluded from the procurement process.

- mapping the supply chain broadly to assess particular produce or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier; and
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

## **Performance Indicators**

The College has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all staff who undertake purchasing activity on behalf of the College to have completed training on modern slavery;
- developing a system for supply chain verification whereby the College evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

## **Board Approval**

This Statement has been approved by the College's Corporation Board on 13 December 2022, who will review and update it annually.