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# **Modern Slavery and Human Trafficking Statement 2024**

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### Version Control

Version	Author	Date	Changes
2	Board Secretary	31/05/2024	Transferred to new template and narrative updated.

## 1. PURPOSE

Edinburgh College will not tolerate slavery or human trafficking in our College or supply chains. We are committed to improving our policies and practices to play our part in eradicating slavery and human trafficking and protecting human rights.

The College's statement demonstrates the commitment of Edinburgh College to the principles of the Modern Slavery Act 2015 and specifically to section 54 (1).

## 2. COLLEGE POLICY AND STATEMENT

Edinburgh College is committed to the eradication of slavery and human trafficking. This policy acknowledges the legislation and laws implemented by the Modern Slavery Act 2015 and details the steps that the College 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.

## 3. INTERNAL POLICIES

We are a Real Living Wage Employer and aim to provide a rewarding working environment in which people are valued and respected. We have a strong commitment to diversity, equality and inclusion and look after the wellbeing of our people, ensuring that they are safe and that we care for them appropriately.

Good corporate citizenship and corporate responsibility are important parts of our identity, as a public body, and an employer. We set out the ethical standards we expect of our staff in a number of policies, including:

- Whistleblowing;
- Bullying and harassment;
- Corporate social responsibility;
- Diversity, equality and inclusion;
- Our approach to recruitment;

- Ethical procurement.

#### 4. OUR SUPPLY CHAIN

The College buys a wide range of goods and services and engages directly with approximately 600-700 suppliers. All of our direct suppliers are registered in the UK but many of their operations and supply chains are global. Some suppliers have complex supply chains with multiple tiers of suppliers and we currently have little visibility over the lowest tiers of the supply chain. Through our collaborative procurement approach with [Advance Procurement for Universities and Colleges Limited \(APUC\)](#), the procurement centre of expertise for all of Scotland's universities and colleges, we hope to gain greater supply chain visibility where the risks may be highest but are deeper in the supply chain.

Edinburgh College's supply chains mainly fall under the following categories, which are:

- Estates Goods and Services
- ICT Equipment and Services
- Professional Services
- Library Resources
- Laboratory Consumables and Equipment
- Human Resources

Procuring goods and services from suppliers linked to supply chains across the world presents risks of slavery and human trafficking. We have put in place the following measures to mitigate this risk:

##### ***Advanced Procurement for Universities and Colleges (APUC)***

Edinburgh College is a member of the FE/HE sector collaborative procurement body, Advanced Procurement for Universities and Colleges (APUC) and utilises this expertise in procuring goods and services. APUC requires all suppliers to commit to the Sustain Supply Chain Code of Conduct confirming that they do not use forced, involuntary or underage labour, provide suitable working conditions and treat employees fairly. APUC is a Founder 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. The College

currently utilises and is committed to the [Sustain Supply Chain Code of Conduct](#), and this underpins all tendering activity and supplier adoption.

### ***Regulated Procurement***

Every regulated procurement process undertaken by Edinburgh College requires tenderers to disclose whether the bidder or any member of their organisation with decision-making powers has been convicted in the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have self-cleansed. The Sustainable Public Procurement Prioritisation tool will be used to review high-risk categories including estates, food and catering, information and communication technology, laboratories, and travel.

### ***Modern Slavery Statement***

For procurement that does not take place through the APUC or other purchasing organisation frameworks (exceeding £50,000 for goods and services and £2,000,000 for works), this statement is included with all tender documents and potential suppliers are required to complete and sign our modern slavery certificate. This certificate requires tendering suppliers to set out the measures that they take to ensure that slavery and human trafficking does not take place in their own organisation or supply chains.

## **5. 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 members of staff. When it is necessary to engage agency workers, we use recruitment agencies who have met our rigorous procurement procedures.

All staff members and agency workers are required to be members of Disclosure Scotland's Protecting Vulnerable Groups (PVG) scheme. A PVG certificate contains all unspent and certain spent conviction information. It also contains any other non-conviction information

that the police or other government bodies think is relevant. This information is checked during the recruitment process and the College will be made aware of any new convictions whilst an individual is working with the College.

### ***Pay***

We are a Real Living Wage Employer and comply with all pay related legislation.

### ***Working Conditions***

Our Health and Safety team oversees the College's 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, wellbeing at work and family friendly arrangements.

### ***Whistleblowing***

All employees and workers are encouraged to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected wherever possible. This commitment is set out in the College's [Whistleblowing Policy and Procedure](#).

## **6. TRAINING AND AWARENESS**

Our Procurement team has been trained on Modern Slavery Awareness.

APUC has established a Sustainable Procurement Leaders Group, of which Edinburgh College is a member. This group considers all key issues related to sustainable procurement and ways to increase and improve sector awareness.

## **7. RESPONSIBILITIES AND REPORTING**

The Edinburgh College Board of Management has overall responsibility for ensuring that this policy statement, and its implementation, complies 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 Senior Management team. Managers at all levels are responsible for

ensuring those reporting to them understand and comply with this policy statement.

Edinburgh 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 website](#).

## 8. REVIEW

This statement to combat slavery and human trafficking was approved on 11 June 2024 by the Edinburgh College Board of Management who review and update it annually.

This statement will be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015.

**End of document**