



**BRIDGWATER  
& TAUNTON  
COLLEGE**

# **MODERN SLAVERY STATEMENT & POLICY 2023**

Author: Head of Human Resources  
Approved by: SMT  
Date: April 2023  
Review Date: April 2024

## Contents

	<b>Section</b>	<b>Page</b>
<b>1</b>	<b>Introduction</b>	<b>3</b>
<b>2</b>	<b>Policy Statement</b>	<b>3</b>
<b>3</b>	<b>Organisational Structure</b>	<b>3</b>
<b>4</b>	<b>General Principles</b>	<b>3</b>
<b>5</b>	<b>Compliance with the Policy</b>	<b>4</b>
<b>6</b>	<b>Due Diligence</b>	<b>5</b>
<b>7</b>	<b>Actions</b>	<b>5</b>
<b>8</b>	<b>Performance Indicators</b>	<b>5</b>
<b>9</b>	<b>Review of Policy &amp; Statement</b>	<b>6</b>

## **1. INTRODUCTION**

- 1.1 This policy and statement sets out Bridgwater & Taunton College's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed to ensure that 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 April 2023 to 31 March 2024.

## **2. Policy Statement**

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The College has a zero-tolerance approach to modern slavery; we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2 We are committed to ensuring there is transparency in our own business practices and in our approach to tackling modern slavery throughout the supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.
- 2.3 This policy applies to all persons working for the College in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners.
- 2.4 To protect those raising the issue of slavery and human trafficking within the organisation please refer to the College Whistleblowing Policy.
- 2.5 Management at all levels of the College are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular training.

## **3 Organisational Structure**

- 3.1 The College employs over 1200 staff and caters for more than 20,000 full-time and part-time students with an annual turnover of £50m.

## **4 General Principles**

- 4.1 Employees and our partners are expected to understand and comply with this policy.

- 4.2 The College identifies the following as the principal areas of potential risk:
- Supply chains
  - Outsourced activities
  - Recruitment practices and agencies
- 4.3 In its supply chains, the College has identified the following business areas as carrying material risks of modern slavery occurring:
- Estates Goods/Services
  - Catering Services
  - Cleaning Services
  - Security and Maintenance Services
  - Recruitment Agencies
  - Information and Technology
  - Training and Development procured
  - Supply of clothing i.e. workwear
  - Work based Learning
- 4.4 When procuring any types of goods or services, the College requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.5 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 Compliance with the Policy**

- 5.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.2 You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 5.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest opportunity.
- 5.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager OR report it in accordance with our Whistleblowing policy as soon as possible.
- 5.5 Where appropriate and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 5.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes

any of the various forms of modern slavery, raise this with your line manager or through a member of the Senior Management team.

- 5.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## **6 Due Diligence**

- 6.1 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:
1. Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
  2. Evaluating the modern slavery and human trafficking risks of each new supplier
  3. Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
  4. Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
  5. Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including termination of the business relationship.

## **7 Actions**

- 7.1 The College will publish this statement and policy on our website to demonstrate our commitment to end modern slavery.
- 7.2 The College will distribute the Modern Slavery Policy and Statement to all active suppliers and ask they read and confirm that Modern Slavery is not occurring in their business or supply chain.
- 7.3 All prospective suppliers will be asked to read and confirm that Modern Slavery is not occurring in their business or supply chain as part of the College process of setting up new suppliers.
- 7.4 The College will carry out briefings and training to managers involved in the purchase of goods and services to ensure they understand the principles of this document

## **8 Performance Indicators**

- 8.1 As at 1 April 2023, the College has 4,184 suppliers, circa 1246 of these suppliers have been active in the past 12 months.
- 8.2 In the period 1 April 2022 to 31 March 2023 there have been no instances of modern

slavery concerns being reported to the College.

## **9 Review of Policy**

- 9.1 The Modern Slavery Policy will be reviewed in line with future legislative changes, case law or at no later than April 2024.