



Modern Slavery & Human Trafficking Statement 2024 - 2025

Policy Reviewed by: HR Department

Review Date: March 2024

To be Next Reviewed: September 2025

CONTENTS

1. Introduction
2. Our Organisation
3. Our Policy on Slavery and Human Trafficking
4. Recruitment Practices
5. Our Supply Chains

1. INTRODUCTION

1.1 This statement sets out Sandwell College’s actions to understand 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. We are committed to driving out acts of modern slavery and human trafficking from within its own business and supply chains.

1.2 We acknowledge our responsibility under the Modern Slavery Act 2015 (“the Act”) and will ensure transparency is achieved within the organisation so the objectives of the Act are achieved on a consistent basis.

1.3 This statement refers to the financial year 2023/2024.

2. OUR ORGANISATION

2.1 Sandwell College consists of multiple locations across the West Midlands and offers outstanding opportunities for over 7,000 16–18-year-old students, 4,000 adult learners and 400 Apprentices to access high-quality teaching and learning. Our three main campuses: Central Campus and Central Saint Michael’s Sixth Form (both in West Bromwich) and at Cadbury Sixth Form College (in Kings Norton, Birmingham), plus satellite venues around the area.

2.2 The College has a diverse Senior Leadership team and is governed by a board of Governors.

2.3 The labour supplied to the College in pursuance of our operations is carried out in the United Kingdom, predominantly in the areas of West Bromwich and Birmingham.

3. OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

3.1 Sandwell College considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

3.2 Sandwell College acknowledges its responsibilities in relation to tackling modern slavery and is committed to acquiring goods and services for its use without causing harm to others. We will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid in line with the national minimum wage.

3.3 All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Senior Leadership Team taking responsibility for overall compliance. The College will provide appropriate training and processes to effectively implement its stance on modern slavery.

3.4 The following Policies and Procedures support the organisation's compliance with the Act:

- Equality & Diversity Policy
- Grievance Policy
- Whistleblowing Policy
- Anti-bribery Policy

4. RECRUITMENT PRACTICES

4.1 Where temporary staff are recruited indirectly by the college this is done so through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the college conducts checks on such agencies before they are approved.

4.2 Through its recruitment processes, the college ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

5. OUR SUPPLY CHAINS

5.1 We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

5.2 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

5.3 In our supply chains, the college has identified the following business areas as carrying material risk of modern slavery occurring:

- Recruitment
- Security Services
- Catering Services
- Construction
- Cleaning
- Stationery and office equipment
- Uniforms and work wear
- Estates/facilities management and maintenance

5.4 When procuring any types of goods or services, as part of corporate social responsibility, the college requires all potential third-party suppliers to confirm that they are compliant with their statutory obligations related to equality and antidiscrimination during any tendering and selection process. This required declaration includes, but is not limited to, compliance to the Modern Slavery Act 2015.

5.5 Tendering and Selection processes that involve third party suppliers carrying material risk must evidence operation of an appropriate level of corporate social responsibility in addition to confirming compliance.

5.6 Any supplier or potential supplier identified as not complying 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.

5.7 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

5.8 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

5.9 This statement has been approved by the college's Senior Leadership Team and will be reviewed at least every three years by Governors.



Graham Pennington
Principal & Chief Executive
March 2024