**Modern Slavery Statement**

**Statement at the end of the 2020/2021 Financial Year**

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour.  The Lanarkshire Colleges, incorporating New College Lanarkshire (and its subsidiary company Amcol (Scotland) Limited) and South Lanarkshire College, are committed to acting ethically, and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the organisations or our supply chains. The Lanarkshire Colleges are overseen by The Lanarkshire Board[[1]](#footnote-1) which has responsibility for ensuring the delivery of high quality further education as set out in the [Regional Outcome Agreement](https://www.nclanarkshire.ac.uk/media/4765/lanarkshire-region-oa-2019.pdf).

**Our Organisational Structure and Supply Chain**

New College Lanarkshire

New College Lanarkshire (NCL) has more than 15,000 students enrolled on a mix of full-time, part-time, evening and commercial courses.

In 2020/2021, it offered more than 700 courses across seven faculties: Care & Science; Construction & Automotive; Engineering; Service Industries; Business, Social Science & Sport; Supported Learning; and Computing & Creative Industries. It delivered programmes on the Scottish Credit and Qualification Framework (SCQF) from levels 1 to 9.

Dedicated to continuous improvement, the College has made investments in the latest technology and facilities across its campuses to ensure that students have the highest calibre of resources. The College has a strong focus on skills and employability, and each faculty has strong business links with industry leaders who are extremely supportive in offering student placements, experience and advice.

NCL has an annual turnover in excess of c£53m and AMCOL (Scotland) Ltd has a turnover of c£3.7m, therefore this is above the threshold (£36m) for organisations required to publish a statement under the Act.

South Lanarkshire College

South Lanarkshire College (SLC) is an assigned College to NCL and has an annual turnover of c£18m which, whilst not above the required threshold under the Act, is included within this published statement for reasons of best-practice and that the Lanarkshire Region seeks to harmonise policies and procedures wherever possible.

SLC has around 5,000 students enrolled on a mix of full-time, part-time, day release and evening courses and deliver programmes on the Scottish Credit and Qualification Framework (SCQF) from levels 1 to 8.

The supply chain structure at both Colleges has 4 main categories of spend: Estates, ICT, Professional Services and Catering Services/Supplies.

Both Lanarkshire Colleges have signed up to the National Recognition & Procedures Agreement (NRPA) for both teaching and support staff. Pay and Terms & Conditions are negotiated at a national level between the Employers Association and the respective Trade Unions. Each College has two representatives within the Employers Association. Although not mandatory for colleges, support staff at a national level have agreed to recognise the Public Sector Pay Policy which covers Salary and Terms & Conditions. In addition both Colleges have achieved Living Wage accreditation, which includes not only the Colleges but also the NCL subsidiary.

**Our Policies on Slavery and Human Trafficking**

The Colleges are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Across the Colleges, there is a Tendering Policy and Procedure, Procurement Strategy, Equality Policy and a Recruitment and Selection Policy in place which are all relevant to Slavery and Human Trafficking.

In addition, the Single Procurement Document (SPD) is used for relevant procurements which incorporates questions on whether a supplier has breached any of their obligations in relation to environmental, social and labour laws.

NCL and SLC have also adopted the ‘Sustain Supply Chain Code of Conduct’ created by APUC (Advanced Procurement for Universities and Colleges) Ltd and this is used in procurement exercises undertaken. The code of conduct includes confirmation that the supplier does not use forced, involuntary or underage labour, provides suitable working terms and conditions, and treats employees fairly. APUC's Slavery Statement can be found [here](https://www.apuc-scot.ac.uk/docs/ModernSlavery.pdf).

**Our Processes on Slavery and Human Trafficking**

Both Colleges are committed to carrying out the procurement of goods and services in an environmentally, socially, ethically, and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to this commitment.

The Colleges will use best endeavours to ensure the procurement of goods and services is carried out through APUC Ltd of which they are members.

APUC leads collaborative tendering activity and has a wide range of framework agreements across a variety of category areas. All the categories for APUC frameworks that the Colleges has used have already undergone an analysis of the specific commodity areas and supply chains to assess potential risks of modern slavery.

Where it is not possible to use a collaborative framework agreement, a standard Invitation to Tender template is used with applicable terms and conditions requiring contractors to comply with current legislation in relation to the Equality Act 2010, National Minimum Wage Act 1998 (as amended), Health & Safety at Work Act 1974 (as amended) and the Modern Slavery Act 2015.

Recruitment checks are carried out by Human Resources to ensure that both Colleges adhere to the provisions of the Immigration, Asylum and Nationality Act 2006, which state that at the time of recruitment an employer must be able to demonstrate that the person to be appointed has permission to work in this country. Therefore, all external candidates invited to attend interview for a post in the Colleges must produce evidence of their entitlement to work in the United Kingdom.

Offers of employment are also subject to a satisfactory PVG Scheme Record and references satisfactory to the College.

**Risk Assessment and Management**

For relevant collaborative and local tenders, a risk assessment using the APUC Prioritisation Tool or APUC Sustainability Test is carried out to assess if the commodity is exposed to modern slavery and trafficking.

APUC has launched its Supply Chain Management (SCM) Tool to verify that framework suppliers have published Modern Slavery Statements in line with the Modern Slavery Act 2015. It has also recently adopted a system, EcoVadis, an internationally recognised sustainability rating company, whose system will provide a further proportionate assessment on suppliers ethical, environmental and social compliance within the framework agreements.

The Colleges are also affiliate members of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry, through socially responsible purchasing in Europe.

**Training on Modern Slavery and Trafficking**

The Supply Chain Manager participates in the Procurement Strategy Group for Colleges where responsible procurement updates are part of the agenda. Online resources on the APUC Responsible Procurement Website provide current information, training and sector guidance.

The Human Resources and Student Funding teams have undertaken training in document fraud and immigration awareness, which was delivered by the Home Office.

**What we are going to do in the Future**

We will continue to ensure risk assessments are carried out using the APUC Prioritisation Tool or the Sustainability Test and address any risks in our tendering processes through key evaluation criteria on high risk areas.

We will continue to promote the use of the Sustain Supply Chain Code of Conduct in our local tenders helping suppliers to understand the importance of compliance with ethical standards.

We shall seek to increase the use of APUC framework agreements and work with APUC to measure ethical compliance through the SCM and EcoVadis Tools. Where relevant and proportionate, we shall look to use these tools for local, contracted suppliers.

We will implement an Anti-Slavery and Human Trafficking Policy which will reflect our commitment to acting ethically and with integrity in all our business relationships and our supply chains.

The Supply Chain Manager shall attend responsible procurement training which shall include modern slavery and related topics.

Future training delivered to stakeholders shall include sustainable procurement and promotion of modern slavery awareness in the supply chain.

Approved: Lanarkshire Board of Management

Signed: Ronnie Smith, Chair of Lanarkshire Board of Management

Date: 15 December 2021

1. NCL currently undergoing structural change [↑](#footnote-ref-1)