

Item 12 LB 27/03/17

BOARD OF MANAGEMENT ITEM - COVER SHEET

Date	Monday 27th March 2017
Subject	Modern Slavery Statement
Prepared by	Janice McAulay, Assistant Principal: Finance
Purpose	To update the Board on this legislative requirement
Recommendation	To approve the content of the Statement and for the Chair of the Board to sign for publication on NCL website.

NB: This statement will be updated on the web to include SLC following the Board meeting where SLC wanted to be included to give a regional statement although they are under the turnover threshold. This step was welcomed by the Board.

Introduction

Section 54 of the Modern Slavery Act 2015 requires commercial organisations to prepare a slavery and human trafficking statement for each financial year. This is a statement that either:

- sets out the steps that the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business; or
- states that the organisation has taken no such steps.

What we need to do

While an organisation does not have to show that it has taken steps to prevent slavery or human trafficking in its business or supply chain, making a statement that it has taken no such steps may have damaging consequences for its reputation and commercial success.

The duty applies to commercial organisations with a total turnover of at least £36 million per year. "Commercial organisations" that are covered by the duty are body corporates and partnerships that carry on a business, in the UK, supplying goods and services.

The slavery and human trafficking statement must be approved at the highest level of an organisation, in the case of NCL, by the Board of Management and signed by a member of the Board. We must publish the slavery and human trafficking statement on our website and include a link to the statement in a prominent place on our homepage (the Media Section of our website).

Next steps and recommendation

Section 54 of the Modern Slavery Act 2015 came into force on 29 October 2015 and applies to financial years ending on or after 31 March 2016. Government's guidance on timing of publication says "In practice, we would encourage organisations to report within six months of the organisation's financial year end". For Scottish FE Colleges with a year-end of 31st July, the Government recommended publication by 31st January. NCL plans to publish its 2016-17 Statement by 31st March 2017 and each subsequent year by 31st December (i.e. will be approved at Board of Management alongside the Annual Accounts).

The draft Statement is attached (below) and was approved by SMT on Friday 10th March. The Statement is now passed to the Board of Management for formal approval.

Statement on Compliance with Modern Slavery Act 2015

Introduction

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that New College Lanarkshire (NCL) has taken and will continue to undertake to ensure that slavery or human trafficking is not taking place within our supply chains or in any part of our business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. New College Lanarkshire is 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 business or our supply chain.

Our Organisational Structure

New College Lanarkshire (“the College”) was formed by the merger of three well-established colleges in Lanarkshire. Motherwell College and Cumbernauld College merged on 1st November 2013 to become New College Lanarkshire. On 1st April 2014, Coatbridge College merged with New College Lanarkshire. This was in line with the Scottish Government’s regionalisation agenda for colleges. The College also has a wholly owned subsidiary, AMCOL Limited, which provides Nursery and After-school care.

The College (including its subsidiary) has an annual turnover in excess of £54m and therefore is above the threshold (£36m) for businesses required to publish a statement under the Act.

With campuses in Cumbernauld, Motherwell, Coatbridge, Kirkintilloch, Hamilton and Broadwood, NCL has around 20,000 students enrolled on a mix of full-time, part-time, evening and commercial courses. It offers more than 800 courses across six faculties: Care & Science; Engineering & Automotive; Service Industries; Business, Social Science & Sport; Supported Learning; and Computing & Creative Industries and delivers programmes on the Scottish Credit and Qualification Framework (SCQF) from levels 1 to 10.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Preliminary work is under way on an Anti-Slavery and Human Trafficking Policy which will reflect our commitment to acting ethically and with integrity in all our business relationships, and the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

What we are doing now

New College Lanarkshire is 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 College will use best endeavours to ensure the procurement of goods and services is carried out through APUC (Advanced Procurement for Universities and Colleges) Ltd of which it is a member.

APUC require all suppliers to sign a supply chain code of conduct to acknowledge their compliance with the code in respect of their organisation and their supply chain. The code of conduct includes confirmation that the supplier does not use forced, involuntary or underage labour, provides suitable working conditions and terms and treats employees fairly. APUCs Slavery statement can be found [here](#).

As part of APUC's standard template for supplier's tendering for the award of a contract a pass/fail question: "Does the supplier meet its obligations under the Modern Slavery Act?" requires to be answered. A further (non-mandatory) question allows the tender to be scored on a graded basis as part of the award criteria: "What measures will you take to ensure slavery and human trafficking is not taking place in your supply chains?"

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. APUC's Head of Development & Sustainability also sits on the board of Electronics Watch.

What we are going to do in the Future

As part of this reporting exercise in this and the coming years, NCL expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

For locally sourced Contracts the College will ensure that Suppliers acknowledge their compliance to the APUC supply chain code of conduct in respect of their organisation and supply chain. The APUC supply chain code of conduct will be embedded in all college tendering documentation.

During 2016/17 the College will continue to develop processes within the Procurement function and College wide to reinforce the aims of the supply chain code of conduct and continue to improve going forward.

Approval

This Statement has been approved and published by New College Lanarkshire Board of Management and will be reviewed at least once annually.

Signed:

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Linda McTavish – Chair of Lanarkshire Regional Board

Date: 27 March 2017