

Modern Slavery Statement

Statement at the end of the 2022/2023 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, with integrity and transparency in all business dealings, and to putting in place effective systems and controls 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 which has responsibility for ensuring the delivery of high quality further education as set out in the [Regional Outcome Agreement](#).

Our Organisational Structure and Supply Chain

New College Lanarkshire

We are one college with five campuses across two Council regions – North Lanarkshire, and East Dunbartonshire. We have an average yearly student count of 15,000 and employ over 1,000 staff members across our academic and professional service teams. We offer over 500 courses across 14 departments:

Automotive Studies	Lanarkshire Institute of Science and Technology	Music Industries and Performing Arts
Humanities	Dental, Health and Social Care	Beauty, Aesthetics and Hair Design with Sustainability
Lanarkshire Business School	Education and Sport	Construction Trades and Technology
Access and Progression	Computing and Digital Technologies	Culinary Art and Food Services
Supported Learning	Visual and Creative Arts	

We collaborate with employers and local businesses to make sure that we provide relevant, up-to-date courses that are of benefit to our students and our region.

We aim to enhance our students learning experiences and outcomes and to meet our aspirations as consistent with our Purpose, Mission, Values and Strategy 2025: -

Strategy 2025: -

Purpose

We advocate Social Justice, enable whole-person education and partner to release potential within or communities.

Mission

We bring Education Closer.

Values

We are just; we give our all; we are kind; we are bold; we respect all; we give more than we take.

Key Strategic Themes

Strengthening the Curriculum

Expanding our Educational Reach

Partnering to Grow

Prioritising Resource Close to the Students

Simplifying How We Work.

New College Lanarkshire (NCL) is reflective of its people, relationships & community. Inspired by accessibility, we are forward-thinking and outwardly focused on a range of initiatives driven by our purpose, mission and values. We reach out with students and our partners at the heart of everything we do.

NCL has an annual turnover in excess of c£54.5m and AMCOL (Scotland) Ltd has a turnover of c£4.7m, 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 the Lanarkshire Strategic Body and has an annual turnover of c£19m which, whilst not above the required threshold under section 54 of the Modern Slavery Act 2015, is included within this published statement for reasons of best-practice and that the Lanarkshire Regional Strategic Body 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 College Employers Scotland and the respective Trade Unions. Each College has two representatives who attend the general meetings of College Employers Scotland. Although not mandatory for colleges, Support Staff at a national level have agreed to consider the Public Sector Pay Policy which covers Salary and Terms & Conditions. In addition, both Colleges have achieved Living Wage accreditation, which includes directly employed staff, outsourced contractors and 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 Procurement Policy and Procedure, Procurement Strategy, Equality Policy and a Recruitment and Selection Policy in place which are all relevant to Slavery and Human Trafficking. This includes the requirement for an Equality Impact Assessment to take place on all Policies and Procedures.

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. 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](#).

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 their best endeavours to ensure the procurement of goods and services is carried out through APUC 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 have 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. The terms and conditions include a clause on Anti-Slavery and Human Trafficking which outlines the expectations and obligations of the Contractor and any applicable subcontractors.

Recruitment checks are carried out by the Human Resources Teams at both Colleges to ensure compliance with 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.

NCL is an early adopter of the EcoVadis sustainability ratings agency. This tool allows the College to review sustainability audits within their supply chain. The College have invited our top 100 suppliers in accordance with spend on the portal. SLC will consider the effectiveness of this system in partnership with NCL prior to considering its implementation.

The Colleges have invited all local, contracted suppliers with a recurrent regulated spend to complete Section 1 of the SCM Tool. This section has a module on Ethics & Environment which the supplier is requested to provide information on their Modern Slavery Statement and their Living Wage status.

In partnership with Police Scotland, tenderers are requested to provide declaration of Non-Involvement in Serious Organised Crime and Non-Involvement in Human Trafficking where it is considered relevant and proportionate.

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 Managers 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 Supply Chain Managers delivered Procurement awareness training to the Heads of Departments/budget holders within the College which included considerations of sustainable procurement and the Modern Slavery Act.

The Human Resources and Student Funding teams at both Colleges 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 continue to invite local, contracted suppliers to complete Section 1 of the SCM portal.

The Supply Chain Managers shall continue to attend APUC responsible procurement training which shall include modern slavery and related topics.

We will further develop our procurement training delivered to stakeholders to include sustainable procurement and promotion of Modern Slavery awareness in the supply chain.

We will establish a risk register and will prioritise the highest-risk categories for supply chain mapping and further analysis.

NCL will review its policies and procedures on an annual basis ensuring they reflect our commitment to acting ethically and with integrity in all our business relationships and our supply chains.

Approved: Lanarkshire Regional Strategic Body

Signed: 

Ronnie Smith, Chair of Lanarkshire Board of Management

Date: 11th December 2023

