

**Modern Slavery Statement**

Document control

Version	Date	Author(s)	Notes on Revisions
1.0	April 2024	Kelly Sooben	New statement

Author	SLT Lead	Date of last PRG	Approval Committee	Approval Committee Date	Frequency of review	Next Review Date
KS	KS	April 2024			Annual	April 2025

**1. PURPOSE AND SCOPE**

This statement applies to South Devon College. The information included in the statement relates to the financial year ending 31<sup>st</sup> July 2024. This statement sets out the preventative steps that the college is taking (and intends to take) to avoid the risk of modern slavery in the context of College services.

**2. DEFINITIONS**

South Devon 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. COMMITMENT**

South Devon College acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The College is committed to ensuring there is no modern slavery or human trafficking in its supply chains or any part of its services. South Devon College understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

South Devon College does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to South Devon College in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

#### **4. POTENTIAL EXPOSURE**

The College identifies the following as potential areas of risk:

- Supply chains, procured services / goods
- Outsourced services including cleaning
- Recruitment
- Construction projects

To fulfil its activities, the main supply chains of the College include those related to:

**Clothing:** The College does not have a significant volume of purchasing from the clothing sector. Most members of staff do not wear a uniform. Having considered our supply chain and our procurement procedures, we have assessed the risk to be low.

**IT:** The College purchases a wide range of electronic and IT equipment and software. Some of those items, particularly laptops, mobile phones and tablets can contain metals usually sourced in high-risk regions and the College is aware there is a well-documented risk of dangerous working conditions and child labour. However, the College's main supplier of IT hardware is Dell, who monitors its supply chain closely. Compliant frameworks are used for the majority of IT spend, suppliers on the frameworks are vetted for Modern Slavery.

The main cleaning contract stipulates that the Real Living Wage (RLW) is to be paid to staff, with regular checks undertaken.

In general, South Devon College considers its exposure to slavery/human trafficking to be low.

When procuring any type of goods or services the College requires all potential suppliers to evidence that they demonstrate a high level of corporate social responsibility during any tendering and selection process. Any potential or existing supplier that does not comply with the Modern Slavery Act 2015, would be removed from the College's list of preferred suppliers.

#### **5. STEPS**

South Devon College carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. These processes will be kept under ongoing review.

This ongoing review will include:

- Identifying and assessing the potential risk areas in our supply chains
- Mitigating the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk owners in our supply chains.

The College has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

## **6. SLAVERY COMPLIANCE OFFICER**

South Devon College has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval:

Signed:

Print name: Denise Acton

Job Title: Director of Finance

Date: April 2024