



**Cheshire College  
South & West**

## Modern Slavery Statement

Key Information	
Reference Number	CCSW - MSS
Published on Website	Yes
ELT Post Responsible for Update and Monitoring	Chief Financial Officer
Date Approved by ELT	16 November 2021
Date Approved by Board <i>(if applicable)</i>	16 December 2021
Date of Next Review	30 November 2022

## **1. Introduction**

- 1.1. This statement is made pursuant to *section 54(1)* of the *Modern Slavery Act 2015* and constitutes Cheshire College's ("*the College*") slavery and human trafficking statement for the financial year ending 2021.
- 1.2. The College is committed to preventing acts of modern slavery or human trafficking and ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the College is taking (*and intends to take*) to avoid the risk of modern slavery occurring within college services.
- 1.3. The College is committed to acquiring goods and services for its use without causing harm to others. It will make reasonable endeavours to ensure all employees and agents within College 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.
- 1.4. All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Executive Leadership Team (ELT) taking responsibility lead for overall compliance.
- 1.5. This statement has been approved by the College's Executive Leadership Team (ELT) and will be reviewed annually.

## **2. Organisational Structure**

- 2.1. The College is a further education college that employs approximately 600 staff, operating in the United Kingdom. Its core business is offering exciting learning opportunities for 11,000 learners and 1,000 Apprentices to access high-quality teaching and learning at modern Campuses in Chester, Crewe and Ellesmere Port.
- 2.2. The College has an annual turnover of £39,107k of which approximately £10,272k is spent on goods and services to support the running of the College. More information can be obtained from the College website at [www.ccs.ac.uk](http://www.ccs.ac.uk).
- 2.3. The College works with a range of suppliers as set out in *Section 4* below.

## **3. Due Diligence Processes**

- 3.1. As part of the initiative to identify and mitigate the risks of modern slavery occurring in any part of college services, the College 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.
- 3.2. The College has in place systems to:
  - 3.2.1. Identify and assess the potential risk areas in the supply chains.
  - 3.2.2. Mitigate the risk of slavery and human trafficking occurring in the supply chains.
  - 3.2.3. Monitor potential risk areas in the supply chains.
  - 3.2.4. Protect whistle blowers.
- 3.3. The College identifies the following as the principal areas of potential risk:
  - 3.3.1. Estates
  - 3.3.2. IT
  - 3.3.3. Outsourced activities
  - 3.3.4. Recruitment agencies

#### **4. Supply chains**

- 4.1. The College has zero tolerance to slavery and human trafficking. It expects all those in the College supply chain and contractors to comply with its values.
- 4.2. The College actively promote the use of consortiums when procuring goods and services, as these already have in place stringent and detailed contracts and due diligence processes to ensure suppliers are not involved with slavery, human trafficking, or any other illegal activity.
- 4.3. In its supply chains, the College has identified the following business areas as carrying material risks of modern slavery occurring:
  - 4.3.1. Recruitment
  - 4.3.2. Security Services
  - 4.3.3. Food & Catering Services
  - 4.3.4. Construction
  - 4.3.5. Cleaning
  - 4.3.6. Stationery and Office Equipment
  - 4.3.7. Clothing (e.g., work wear and sports uniforms)
- 4.4. When procuring any types of goods or services, the College requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.
- 4.5. Any supplier or potential supplier that does not comply 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.
- 4.6. In terms of future steps, the College will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with countries and products.

#### **5. Training**

- 5.1. To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and in the organisation, the College invests in educating staff (*in applicable roles*) to recognise the risks of modern slavery and human trafficking in the organization and supply chains.
- 5.2. Having assessed the training needs for staff operating in different parts of the organisation, the College will look at devising and implementing training and awareness-raising methods attuned to relevant staffing groups.
- 5.3. The College 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. This statement is made available to all staff members, stakeholders, and the general public by publication on the College website.
- 5.4. The College will also encourage business partners to provide training to their staff and suppliers and providers.

#### **6. Recruitment Practices**

- 6.1. Temporary staff and staff recruited indirectly by the College are recruited 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.

#### **7. College Policies**

- 7.1. The College already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of college business. As part of the College's continued commitment to combating modern slavery, the College operates the following policies:

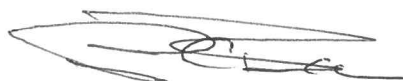
- 7.1.1. Anti-Corruption and Bribery Policy – the College is committed to the highest standards of ethical conduct and integrity in its business activities. The College will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.
  - 7.1.2. Grievance Procedure for Employees, Grievance Procedure for Senior Post-Holders and Whistleblowing Policy - these policies allow employees, learners, and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
  - 7.1.3. Safer Recruitment and Selection Policy - this policy ensures that the College follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.
  - 7.1.4. Sub-contracting Fees and Charges Policy - this policy ensures that the College only uses sub-contractors that meet College standards and satisfy due diligence processes.
  - 7.1.5. Procurement policy - this policy reflects the College's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.
- 7.2. The College makes its suppliers aware of its policies, ensuring that those suppliers adhere to the same high standards.

## **8. Performance Indicators**

- 8.1. Where the College has identified risks of modern slavery occurring in any part of its services, it will aim to introduce key performance indicators (*KPIs*) to measure progress against reducing such risks. The College will consider setting and reviewing KPIs in the following contexts:
- 8.1.1. use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery;
  - 8.1.2. training and awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action and
  - 8.1.3. oversight of third-party suppliers of relevant goods and services supply chains.



**J S Dhesi**  
**Accounting Officer**  
16 December 2021



**Dame P Bacon**  
**Chair**  
16 December 2021