



THE  
**TRAFFORD**  
**COLLEGE**  
GROUP

**Anti-Slavery and Human  
Trafficking Statement  
2021**

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<b>Consultation:</b>	<b>TCG Leadership Team</b>
<b>Approval:</b>	<b>TCG Board of the Corporation</b>
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## **1. Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 2021.

The Trafford College Group is committed to 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 Group is taking (and intends to take) to avoid the risk of modern slavery occurring within college services.

## **2. Organisational Structure**

The Group is a further education and higher education employer employing approximately 875 employees, operating in the United Kingdom. Its core business is teaching a student population of approximately 14,600.

The Group has an annual turnover of £46million of which approximately £13million is spent on goods and services to support the running of the Group.

## **3. Supply Chains**

The Group's third-party supply chains include goods and services, mainly from providers based within the UK or EU, for the effective running of the organisation. A wide range of goods and services are purchased that include IT hardware, IT services and software, furniture, stationery, electronics, travel services, printing, mailing, property and facilities services and catering. We recognise that modern slavery is usually hidden and that there are high risks of slavery linked to the global supply chains of goods and service we procure. The responsibility for budgets and contracts is mainly devolved to departmental heads with some managed centrally. All new suppliers are vetted centrally via the Finance Department before they can be engaged.

When procuring any types of goods or services, the Group requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the Group's own policies and procedures, will be removed from the Group's list of suppliers and will not be considered for future supply to the Group unless they can demonstrate that these compliance requirements are met.

In terms of future steps, the Group will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

## **4. Due Diligence Process**

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of the Group's services, the Group 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.

The Group has in place and has started in some areas to take appropriate steps to ensure systems are in place to:

- Identify and assess the potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Undertake appropriate pre-employment checks on directly employed **colleagues** and require agencies to provide assurance that pre-employment clearance has been obtained for agency **colleagues**.
- Implement a range of controls to protect our **employees** from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair rates of pay, fair terms and conditions of employment and access to training and development opportunities.
- Consult and negotiate with Trade Unions on proposed changes to employment, work organisation and contractual relations.
- Purchase products from UK-based firms, who may also be required to comply with the requirements of the UK Modern Slavery Act (2015).
- Where possible, build long-standing relationships with suppliers.

## 5. Training

Advice and training about modern slavery and human trafficking is available to **employees** through our safeguarding training, policies and procedures.

## 6. Recruitment Practices

Temporary **employees and employees** recruited indirectly by the Group are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the Group conducts checks on such agencies before they are approved.

Through its recruitment processes, the Group ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

## 7. Trafford College Group Policies

The Group 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 Group business. The Group operates the following policies:

- **Grievance and Whistleblowing Policies:** These policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
- **Employee Safeguarding Code of Conduct:** This code sets out the actions and behaviour expected of them whilst employed by the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Recruitment and Selection Policy:** This policy ensures that the Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 8. Performance Indicators

Where the Group 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 Group will consider setting and reviewing KPIs in the following contexts:

- Use of grievance and whistleblowing procedures by **employees** to raise concerns about instances of modern slavery
- Training and awareness-raising amongst **employees** including risk management
- Appropriate decision-making and timely remedial action
- Oversight of third-party suppliers of relevant goods and services supply chains

This statement will be made available to all employees, stakeholders and the general public by publication on our website. We will 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.

Having assessed the training needs for employees operating in different parts of the Group, the Group will look at devising and implementing training and awareness-raising methods attuned to relevant **employee** groups. Training courses may be devised in cooperation with external, specialist training providers.

This statement has been approved by the Group's Board of the Corporation and will be reviewed at least once annually.

Signed:

A handwritten signature in black ink, appearing to read 'J Scott', written in a cursive style.

**James Scott**  
**CEO/Principal**

Date: 30th June 2021