



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

**Anti-Slavery and Human  
Trafficking Statement  
2022**

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## **1. Introduction**

This statement sets out Trafford College Group's (TCG's) actions and commitment to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking either within its own business or supply chains.

The following sets out practices already in place at TCG and any committed actions set for 2021/22 in response to the introduction of the Modern Slavery Act in 2015.

## **2. Our Organisation**

TCG is one of the largest educational, training and employability organisations in the Northwest of England, managing five campus sites and serving over 14,000 students and customers annually. The Group employs over 800 people with an annual turnover in 2021 of circa £37m of which approximately £10m is spent on goods and services to support the running of the Group.

TCG value and empower our people by:

- Being both inclusive and diverse.
- Trusting and respecting our communities.
- Taking ownership whilst working collaboratively.
- Inspiring excellence and ambition.

TCG have an effective range of suppliers who deliver a wide diversity of products and services to enable our front-line and on-line services to take place.

We believe in procuring and working with like-minded suppliers who share our mission, vision, and values. We value the people we engage with throughout our supply chain to assist the delivery of our work and at the right quality standards. We believe that by working together we can add value and innovation to our mission and generate ethical and economic public expenditure, which impacts positively in communities and the environment in which we operate.

## **3. Our Slavery and Human Trafficking Policy**

TCG is committed to acquiring goods and services for its use without causing harm to others. TCG will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of human trafficking or forced/compulsory/bonded labour, and that they are paid as a minimum the applicable national minimum wage in their country of residence.

TCG already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in and part of TCG business. TCG operates the following policies and procedures which supports the organisation's compliance with the Act:

- 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.

- Staff Safeguarding Code of Conduct – this code sets out the actions and behavior expected of them whilst employed by TCG. TCG strives to maintain the highest standards of employee conduct and ethical behavior 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.

#### **4. Our Supply Chains**

TCG's supply chain has been categorised to identify general areas of global risk that could potentially harbour Modern Slavery. These areas include:

##### **High TCG Spend with Higher Risk Globally**

- Electronics, computers, and equipment procured from international manufacturers.
- Food (e.g., rice, sugar, cocoa, fruit, and vegetables).

##### **Lower TCG Spend with Higher Risk Globally**

- Garments (e.g., workwear and sportswear).
- Low price goods (e.g., Credit Card expenditure outside Frameworks through third-party retailers such as Amazon).
- General course and construction materials.
- Office equipment.

##### **High TCG Spend with Lower Risk Globally (i.e. UK-based Suppliers)**

- Recruitment and Sub-Contracted Labour (UK).
- Construction.

TCG'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, TCG requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process, with TCG therefore placing a reasonable reliance on the modern slavery policies of said third parties where goods and services may be further sub-contracted.

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

## **5. General Principles Used at TCG for Mitigating Against Risk**

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of TCG's services, TCG 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, and include taking the 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 for directly employed staff and require agencies to provide assurance that pre-employment clearance has been obtained for agency staff.
- Implement a range of controls to protect our staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair rates of pay – including that our minimum hourly rate meets the Real Living Wage - fair terms and conditions of employment and access to training and development opportunities.
- Provide advice and training about modern slavery and human trafficking is available to staff through our safeguarding training, policies and procedures.
- 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.
- Be aware of any Modern Slavery risk in the pre-procurement stages of particularly high spend procurements.
- Use compliant Frameworks where possible to better control Modern Slavery via the Selection Criteria on Frameworks – this ensures that suppliers adhere to the Modern Slavery Act and can be disqualified for breaches.
- Openly discuss company approaches to Modern Slavery and Corporate Social Responsibility (CSR) prior to contract signature (e.g., in presentations and final meetings).
- Encourage all construction related suppliers to work towards Construction Line Gold with the added benefit of compliance with the Modern Slavery Act 2015.

## **6. A Review Over The Last Year**

TCG procurement has been particularly alert to a changing global market and fluctuating prices both post-Brexit and during Covid-19. As a result, Modern Slavery checks have taken place in high volume supply chains (where risk could damage TCG) to see the staffing approach in the country of goods origin.

Checks of Modern Slavery Statements have been assessed where spend is high and risk could occur (e.g. as a result of company take overs), and where Modern Slavery policies may be weaker or non-existent.

Although a low spend at TCG, we have further reduced the expenditure on low price new goods with potential risks such as common online buying sites, where the supply chain is less manageable for TCG (e.g. for purchases of clothes and electronics) through credit card spend. Instead, referring buyers to the preferred or pre-checked Suppliers where possible.

## **7. Future Plans**

TCG expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

Adequate resources will be made available to ensure slavery and human trafficking is not taking place within our organisation or within our supply chains to the best of our knowledge.

TCG strive to continuously improve our programmes of education to enable social mobility and economic prosperity in civic society.

The TCG Executive Leadership Team take responsibility and accountability for implementing this statement and our next steps:

- To continue to assess higher risk areas and ask suppliers their approach to Modern Slavery.
- To review our supplier base which has increased following recent mergers.
- When contracts are in preparation for renewal, we will look to incorporate 'Modern Slavery' in to TCG Contracts provisions.
- Review Modern Slavery Statements for high spend supplies (e.g., when a company takeover occurs).
- We will continue to be alert to new sourcing practices, post-Brexit and during and post Covid-19, to ensure large suppliers continue to protect against Modern Slavery. We will seek help and guidance from Frameworks where required / needed.
- We will continue to review and consolidate suppliers on to Public Frameworks (where this makes best sense for TCG) in order to control risk and review approach annually.
- We will endeavor to stop purchases from online suppliers for high-risk items where the source of the item is unclear – as although prices may be cheap, it does not provide adequate protect against modern slavery (e.g., Electronic Goods via third-party selling sites).
- Apply due diligence to ensure business supply chains are slavery-free, and to protect against child labour, forced labour, human trafficking, gross human rights violations, or other health and safety risks to workers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Trafford College Group's Slavery and Human Trafficking Statement for the current financial year.