

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement sets out actions of Hull College Group (the Group) 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 in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 August 2017 to 31 July 2018.

As part of Further Education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. It is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Hull College Group is a Further Education College based across three sites (Hull, Harrogate and Goole). In 2017-18 the Group delivered activity that produced £29.6million in funding body main allocation funding. The Group had 2,499 students funded under the ESFA Young People’s allocation, 153 under 16s funded as Direct Entry students, 4,007 adults on classroom based provision and 5,882 apprentices either new starts in the year or continuing from the previous year. In addition, the Group had 916 Higher Education students.

The Group has a supply chain covering staffing resources and operational activities including, but not limited to: estates management, cleaning and transport. It also has a small number of partners (subcontractors) who deliver education and training on its behalf.

The College is aware of its responsibility under the Act and is developing a framework to ensure its supply chain complies with the Act; this will include policies, risk assessment, due diligence and training requirements.

RELEVANT POLICIES

Business Operations

Hull College Group has a number of policies that assist in preventing slavery, human trafficking and other forms of exploitation in its operations, including:

<ul style="list-style-type: none"> • <i>Finance Policy and Procedure</i> • <i>Procurement Procedures</i> • <i>Procurement Strategy</i> • <i>Environmental and Sustainability Policy</i> • <i>Fraud, Bribery and Corruption Policy</i> 	<p>Hull College Group is committed to ensuring that its subcontractors and suppliers adhere to the highest standards. Further work will be undertaken to ensure all procedures fully meet the requirements of the Act.</p>
<ul style="list-style-type: none"> • <i>Safeguarding Children and Vulnerable Adults Policy</i> • <i>Recruitment and Selection Policy and Procedures</i> • <i>Operating Procedures</i> 	<p>Hull College Group has established recruitment processes to ensure that comprehensive pre-employment checks take place relating to DBS, Barring List, proof of identity, right to work, references and medical clearance.</p>

<ul style="list-style-type: none"> • Employee Code of Conduct • Employee Operating Procedures • Bullying and Harassment Policy • Grievance Policy 	<p>Clear policies are in place to ensure that staff receive fair treatment from the point of application and throughout their employment.</p> <p>Hull College Group’s Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.</p> <p>There are policies that enable staff to raise any complaints, grievances or other matters of concern that they have, and the Group encourages membership of a Trade Union who can provide representation, if necessary. Staff also have key stakeholder groups to feedback to the Group and access to HR advice and guidance.</p>
<ul style="list-style-type: none"> • Public Interest and Whistleblowing 	<p>The Group encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.</p>

Learner Support and Safeguarding

The Group also has in place the following policies which are designed to ensure that learners are protected from slavery and human trafficking:

<ul style="list-style-type: none"> • Safeguarding Children and Vulnerable Adults policy • Safeguarding Children and Vulnerable Adults guidance • Looked After Children and Care Leavers policy • Anti-Bullying policy 	<p>All staff are required to undertake mandatory safeguarding training, including annual updates. The Group also has in place a dedicated Safeguarding Team, including senior and deputy lead safeguarding officers, and locally agreed multi-agency procedures for supporting learners at risk of harm.</p>
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DUE DILIGENCE

The Group undertakes appropriate financial and due diligence checks when considering taking on new suppliers and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

Work in 2018-19 will consider any necessary changes to the Procurement, Subcontracting and Tendering arrangements to ensure that appropriate assurance is sought that all subcontractors and suppliers engaged by the Group comply with the Act. Consideration will also be given to appropriate operational key performance indicators to monitor this compliance.

RISK ASSESSMENT

The main areas of risk in relation to slavery and human trafficking arise from the following areas:

- Supply of goods and services including through supply chains which may have involved human slavery, trafficking and other forms of exploitation. To mitigate this risk, the Group actively promotes the use of consortia 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.
- Learners studying with the Group who may be subject to human slavery, trafficking and other forms of exploitation outside of the Group's college environment. These learners may disclose this information to College staff. The Group's dedicated safeguarding and reporting procedures will ensure that where disclosed, such information will be dealt with appropriately and referred within multi-agency agreed timelines for safeguarding learners at risk.
- Staff employed by the Group may also be subject to human slavery and other exploitation outside the college environment. The Group's recruitment policies together with its employment policies and processes provide opportunity for this information to be disclosed and for subsequent action to take place, as appropriate.
- The Group is considering any additional training required for any sectors which may be deemed to be higher.

TRAINING AND AWARENESS RAISING PROGRAMME

The Group will ensure that key staff will undertake training on modern slavery, where deemed necessary and will engage with external training providers, as appropriate.

The Group will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking; issues;
- What external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by the Hull College College's Governing Body on 20 December 2018, and will be reviewed and updated annually as part of the review of the Financial Statements.

Chair	Chris Fenwick	CEO	Michelle Swithenbank
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