

MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 requires the College to produce a statement setting out the steps they have taken to ensure that there is no modern slavery in their own organisation and in their supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 July 2019. This statement was approved by the College Board of Management on 4 February 2019. We will review this statement annually.

OUR COMMITMENT

West College Scotland (WCS) adopts a zero-tolerance approach to slavery and human trafficking and is committed to protecting human rights. We will act ethically and responsibly in all of our relationships by working with suppliers that share and adhere to this commitment. We will also put in place reasonable measures to ensure that slavery and human trafficking does not occur within our own organisation or our supply chains.

OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING

We operate a number of policies which support our commitment to human rights and which set out ways that we will minimise the risk of slavery and human trafficking. These policies include our Sustainability and Social Responsibility Statement and Equal Opportunities Procedure.

OUR SUPPLY CHAINS

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our procedures reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We purchase a wide range of goods and services from suppliers including:

- ▶ **ICT equipment and services**
- ▶ **Professional services**
- ▶ **Estates and facilities management goods and services**
- ▶ **Food and catering supplies**
- ▶ **Books and printing**
- ▶ **Teaching supplies**
- ▶ **Furniture and stationery**
- ▶ **Waste and recycling services**

Procuring goods and services from suppliers linked to supply chains across the world presents risks of slavery and human trafficking. We have put in place the following measures to mitigate this risk:

Advanced Procurement for Universities and Colleges (APUC)

The College utilises the services of APUC to procure goods and services and of which WCS is a member. APUC requires all suppliers to sign a Supply Chain Code of Conduct confirming that it does not use forced, involuntary or underage labour, provides suitable working conditions and treats employees fairly. APUC is a Founder Member of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe.

WCS Procurement Team currently utilises and is committed to the APUC Supply Chain Code of Code to underpin all tendering activity and supplier adoption.

Regulated Procurements

Every regulated procurement process conducted by the college requires tenderers to disclose whether the bidder or any member of their organisation with decision-making powers has been convicted in the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have self-cleansed. The Sustainable Public Procurement Prioritisation tool has been used to review high-risk categories including estates, food and catering, information and communication technology, laboratories and travel.

Modern Slavery Statement

For procurement that does not take place through the APUC or other purchasing organisation frameworks (exceeding £50,000 for goods and services and £2,000,000 for works), this statement is included with all tender documents and potential suppliers are required to complete and sign our modern slavery certificate. This certificate requires tendering suppliers to set out the measures that they take to ensure that slavery and human trafficking does not take place in their own organisation or supply chains

OUR PEOPLE

We have put in place the following measures to mitigate the risk of slavery or human trafficking taking place directly within our organisation:

Recruitment Practices

We carry out rigorous right to work checks for all new members of staff. When it is necessary to engage agency workers, we encourage all staff to use recruitment agencies who have met our rigorous procurement procedures.

Pay

We comply with all pay related legislation and the College is a Living Wage Employer.

Working Conditions

Our Health and Safety Team oversee the College's compliance with health and safety legislation across our campuses. We are committed to fair working practices and publish a range of policies and procedures setting out our approach to health and safety, well-being at work and family friendly rights.

Whistleblowing

All employees are encouraged to raise concerns about possible wrongdoing or malpractice within the College and will be protected from any reprisals should they choose to make such a disclosure. This commitment is set out in the College's Public Interest Disclosure Policy.

ADDITIONAL INFORMATION

Training

The College requires all procurement and HR managers to complete training on modern slavery as a module. This training will include Colleges purchasing practices, how to assess / identify the risk of slavery and human trafficking, what external assistance is available and what steps to take if manager suspects human trafficking and slavery to be taking place.

Awareness-raising Programme

As well as training relevant staff, the College has raised awareness of modern slavery issues by advertising the issues it raises on the staff and student intranet sites.

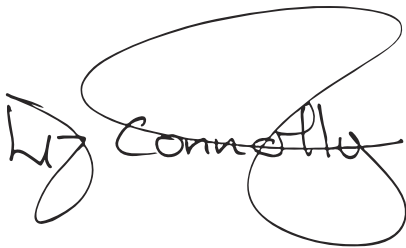
Breaches

Any alleged violations of human rights by our employees will be fully investigated and disciplinary action, up to and including dismissal, will be taken where appropriate. We will take action to address any human rights breaches identified in our supply chain, which may include terminating a supplier's contract where serious violations are discovered.

Our Effectiveness in Combatting Slavery and Human Trafficking

We will regularly review the effectiveness of the measures set out in this statement in combatting slavery and human trafficking.

This statement was approved on 4 February 2019 by the College's Board of Management who review and update it annually.

A handwritten signature in black ink, appearing to read 'Liz Connolly', with a large, stylized flourish above the name.

Liz Connolly

Principal and Chief Executive