



AYRSHIRE COLLEGE MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2022-23

1 Introduction

This statement, for the financial year beginning 1 August 2023 and ending 31 July 2023, evidences Ayrshire College's continued commitment to [The Modern Slavery Act 2015](#) and in particular to Section 54 (1).

The purpose of the statement is to update on the College's Policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains, and the actions taken to identify, mitigate and where possible prevent such practices taking place in any part of the College's business.

2 About Ayrshire College

Ayrshire College provides further and higher education on a wide range of courses. The College currently has in the region of 12,000 students and circa 700 staff. The College operates from three main campuses in Ayr, Kilmarnock and Kilwinning.

The College is governed by a Board of Management with members drawn from a range of local businesses, private and public sector organisations. The Board's membership also includes student and staff representatives.

The College buys goods and services in all the main categories such as ICT, estates, human resources, professional services and curriculum supplies. The principal categories which carry risks are office supplies, clothing such as PPE and uniforms, ICT equipment and some estates services such as security services.

3 College Policies on Slavery and Human Trafficking

The College's strategic procurement intention is that all purchasing activities should in the first instance focus on existing College suppliers. This includes APUC or other framework agreements which have already been subject to a competitive process and where the risk has already been assessed and addressed. The College is a member of Electronics Watch (a collaborative organisation addressing labour rights issues in ICT supply chains) and also Ecovadis, who conduct assessments of supply chain providers and rate suppliers against international standards.

The College also has a number of policies that assist in preventing slavery and human trafficking in its operations. The three main policies are set out below.

Sustain Supplier Code of Conduct

The College is committed to ensuring that its suppliers adhere to the highest standards of ethics, and has reviewed its Terms & Conditions to ensure that new and existing suppliers are aware of their obligations under the Act and comply with the APUC's [Sustain Supply Chain Code of Conduct](#).

Anti-Bribery and Corruption 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 operating on its behalf.

Whistleblowing Policy

Ayrshire College encourages all its workers, 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.

4 Risk Assessment and Due Diligence

Ayrshire College undertakes risk assessments to determine which parts of the College and its supply chains are most at risk of modern slavery.

The College will not knowingly support or deal with any businesses found to be involved with any acts of slavery or human trafficking. The College's supplier approval process incorporates appropriate financial and due diligence checks to implement this. All new contracted suppliers are vetted for compliance with the regulations as part of the due diligence process.

Responsibility for the Policy

The College's Senior Leadership Team has overall accountability for ensuring that this Policy and its implementations comply with the College's legal and ethical obligations though it is staff involved in HR, finance, procurement and purchasing who have operational responsibility.

5 Staff Training and Awareness

Ayrshire College requires that key college staff undertake training on modern slavery. This is available as an on-line module. In addition, awareness of modern slavery issues is raised throughout the year through internal campaigns.

6 Actions for Year 2023-24

Ayrshire College will continue to work to get a better understanding of its supply chains and also towards even greater transparency and responsibility of people working in them. This includes:

- on-going identifying and assessing of potential risk areas in the College's supply chains

- mapping out supply chains, which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations to ensure that these risks are mitigated
- monitoring potential risk areas in the College's supply chains
- continuing to promote use of Sustain Supply Chain Code of Conduct in all procurements
- regularly review the college's procurement process to ensure compliance with the requirements of the Act.

The College measures progress against reducing any risks of modern slavery occurring in any part of its operation or supply chain through performance indicators. These performance indicators include:

- the number of new suppliers demonstrating compliance with Modern Slavery requirements
- the number of existing suppliers demonstrating compliance with Modern Slavery requirements
- the number of staff who have undertaken training on the human face of modern slavery, for example, gender-based violence and racism

Progress against these performance indicators is reported on through the College's annual Procurement Report.

7 Approval and Review

This statement has been approved by Ayrshire College Senior Leadership Team on 31 October 2023. It will be reviewed and updated annually.

Alan Ritchie
Vice Principal Finance & Infrastructure
31 October 2023

(Kath Harper, Procurement Manager- APUC Partnership)