

AYRSHIRE COLLEGE MODERN SLAVERY STATEMENT 2021-22

1 Introduction

Purpose of the Statement

Ayrshire College continues to be absolutely committed to the protection of and respect for all human rights. Ayrshire College maintains a zero-tolerance position to slavery and human trafficking in all its forms.

This updated statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes Ayrshire College's slavery and human trafficking statement for the financial year beginning 1 August 2021 and ending 31 July 2022.

2 Ayrshire College Overview

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 1,000 staff. The College operates from its three main campuses in Ayr, Kilmarnock and Kilwinning.

The College is led 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.

Ayrshire College has a diverse supply chain covering all teaching and operational activities including but not limited to estate management and transport.

The College is aware of its legal responsibility and is working to ensure that its supply chain continues to comply with the Act. This includes policies, risk assessment, due diligence and training requirements.

3 Relevant Policies

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

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 suppliers are vetted for compliance with the regulations as part of the due diligence process. The College works with the Association of Procurement for Universities and Colleges (APUC) to assess the College's suppliers' compliance with the Supply Chain Code of Conduct. APUC has developed a web-based assessment tool (SUSTAIN) linked to the contracts database containing contracts/agreements used by the whole sector. The website assesses suppliers at three achievement/compliance levels in social, ethical, economic and environmental areas. The tool enables the College to view the status of its suppliers, and for sub tier suppliers to be linked and then assessed.

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 Awareness and Training

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 2021/22

Ayrshire College will continue its commitment to preventing slavery and human trafficking in its supply chain by working with its suppliers, to get a better understanding supply chains and working towards even greater transparency and responsibility towards people working in them. This includes:

- identifying and assessing 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
- building long-standing relationships with the College's supply chains, where possible, to ensure these entities have and follow suitable anti-slavery and human trafficking policies and processes

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 staff undertaking the Social and Corporate and Responsibility course Modern Slavery module
- 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 will be 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 21 September 2021. It will be reviewed and updated annually.