

Board of Management

Date of Meeting	Wednesday 22 February 2023
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Agenda Item	3.2
Subject of Paper	Modern Slavery Statement Update
FOISA Status	Disclosable
Primary Contact	Deborah Fagan, Head of Procurement
Date of production	3 February 2023
Action	For Approval

1. Recommendations

The Board of Management are asked to review and approve the revised Modern Slavery Statement (Appendix A) required under section 54 of the Modern Slavery Act.

2. Purpose

Under section 54 of the Modern Slavery Act organisations that supply goods or services and have a consolidated global turnover of £36 million per annum or more are required to prepare and publish a slavery and human trafficking statement for each financial year. All bodies corporate and partnerships that meet the turnover requirement will be caught, regardless of where they are incorporated, if they carry on any part of their business in the UK. Notably, organisations that primarily pursue a charitable or educational aim have not been excluded from the requirements.

An organisation that is caught by the Modern Slavery Act must prepare a Statement and publish it on its website setting out the steps it has taken to ensure that there is no slavery or human trafficking in its business and supply chain.

The Government's guidance on section 54 of the Modern Slavery Act, 'Transparency in Supply Chains' seeks to assist organisations in determining whether they are subject to the requirements and, if so, what information their Statement needs to include. The Guidance requires organisations to be transparent about the steps taken both in their own businesses and their supply chains, and if the organisation has taken no such steps, it must publish a Statement to this effect.

3. Consultation

The statement was revised by Deborah Fagan, Head of Procurement with consultation from Naira Dar, ED&I Manager. The statement has been reviewed and pre-approved by following SMT and ELT members:

Sheila Lodge, Depute Principal and COO
Drew McGowan, College Secretary
Will McLeish, Communications Director
Michael Cross, Director - Corporate Support

4. Key Insights

The statement, in line with the guidance, covers the following areas:

- Introduction outlining the Colleges commitment to procuring goods and services for its staff and students without causing harm to others.
- Category Areas of Spend
- Our Policies on Slavery and Human Trafficking
- Our plans for the future

5. Impact and Implications

By not publishing a statement the College will be in breach of the Modern Slavery Act 2015.

The Crown Commercial Service and Home Office are currently auditing all relevant organisations to ensure they are complying with the Modern Slavery Act. Francesca Livesey of Crown Commercial Services and the Home Office are exploring the option on banning companies from receiving UK government contracts for three years for not publishing Modern Slavery statements.

Appendix A – Modern Slavery Statement



Modern Slavery Statement 2023

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Charity Number: SC0 36198

Modern Slavery Statement

1. Introductions

City of Glasgow College is committed to procuring goods and services for its staff and students without causing harm to others. In doing so, City of Glasgow College is committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

City of Glasgow College recognises that it has a responsibility to take a robust approach to slavery and human trafficking and this statement intends to demonstrate the College's progressive approach in actions and commitment to understanding potential modern slavery risks related to its activities and to minimise the risk of slavery and human trafficking in its supply chains.

This statement is designed to satisfy the requirements of Section 54 Part 6 of the Modern Slavery Act 2015, by informing our students, staff and the public about City of Glasgow College and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

The annual turnover of City of Glasgow College is above the threshold for businesses required to publish a statement under the Act.

2. Our Categories

City of Glasgow Colleges supply chains mainly fall under six categories:

- Estates Goods and Services
- ICT Equipment and Services
- Professional Services
- Library Resources
- Human Resources

- Maritime Goods and Services

The principal categories which carry risks are office supplies, laboratory consumables, ICT equipment and some estates services, such as cleaning and security services.

3. Our Policies on Slavery and Human Trafficking

We have a range of strategies which support our commitment to human rights and which set out how we will minimise the risk of slavery and human trafficking. These include our Sustainability Strategy, Corporate Social Responsibility Charter and Equal Opportunities Procedure. 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 strategies 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 within our own organisation or in our supply chains.

City of Glasgow College has embedded sustainable procurement practice throughout its Procurement Policy and Procedures, to which the College is committed. Measures included within the Public Contracts (Scotland) Regulations 2015 are embedded in all of our procurement activities and relevant Scottish Procurement Policy Notes (e.g. SPPN 3/2020) are circulated to relevant staff and implemented where required.

APUC (Advanced Procurement for Universities and Colleges) Limited is the procurement centre of expertise for all of Scotland's universities and colleges, taking advantage of opportunities for collaborative procurement. Collaborative tenders are led or jointly managed by APUC on behalf of institutions by working with other purchasing consortia across the UK where it adds value by doing so. City of Glasgow College is a member of APUC and currently utilise APUC's managed contracts which cover some of the categories listed above. APUC's Slavery statement can be found [here](#).

City of Glasgow College's Procurement Department currently utilises and is committed to the APUC Supply Chain Code of Conduct to underpin all tendering activity and supplier adoption. The APUC Code specifies that suppliers shall not use forced, involuntary or underage labour.

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. APUC's Head of Development & Sustainability also sits on the board of Electronics Watch.

4. Our Plans for the Future

City of Glasgow College is committed to better understanding its supply chains and working towards greater transparency and responsibility towards people working in them.

Working with our Suppliers, we can map out those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations.

As part of our initiative to identify and mitigate risk, City of Glasgow College commits to:

- Identify and assess 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 whistleblowers and report unethical conduct.
- Where possible, build long-standing relationships with our supply chains to ensure these entities have and follow suitable anti-slavery and human trafficking policies and processes.
- Include a clause in our General Terms and Conditions in relation to Modern Slavery. This will outline the obligations of the supplier in contracting with the College. It extends to due diligence procedures being in place for sub-contractors to that supplier. The College reserves the right to terminate and seek recompense for any contract where the supplier is found to be in breach of the requirements of the Modern Slavery Act 2015.

This Statement has been approved by City of Glasgow College Board of Management on 22nd February 2023 and will be reviewed at least once annually.