



# Modern Slavery & Human Trafficking Statement

**Policy Area:** General Executive

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**Policy Owner:** Hannah Caldwell

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**Approved By:** Executive Team

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**Date of Approval:** 20 July 2023

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## 1. Introduction

The Modern Slavery Act 2015 requires organisations with a turnover of over £36 million to publish an annual statement setting out the steps they have taken to prevent modern slavery in their organisation and supply chains.

This statement sets out East Sussex College's actions to identify, prevent and mitigate modern slavery or human trafficking in its operations and supply chains.

This statement relates to activities during the financial year August 2022 to July 2023.

## 2. Structure of the college

East Sussex College comprises two former further education colleges; on 29 March 2018 the assets and liabilities of Sussex Downs College were transferred to Sussex Coast College Hastings on the merger of the two organizations, and the name change was approved by the Department of Education with effect from 16 April 2018.

The college is an exempt charity for the purposes of the Charities Act 1993, as amended by the Charities Act 2011.

The college's core business is teaching with a learner population of over 15,000 students and approximately 1,200 employees (880 established and 320 sessional).

The college has an annual turnover of £47 million, of which approximately £17 million is spent on goods and services to support the running of the college.

## 3. Due diligence processes

As part of its initiative to identify and mitigate the risks of modern slavery occurring in any part of its services, the college has adopted due diligence processes proportionate to the risk identified and is dependent on the severity of the risk and other relevant factors.

## 4. Policies

East Sussex College has several policies that assist in preventing slavery and human trafficking within its operations by embedding good practice and providing remedies for individuals concerned about any potential instances of modern slavery within the college business. These include:

- Grievance & Whistleblowing Policies: all employees, customers and business partners are encouraged to report any concerns relating to the direct activities or the supply chains of the college, without fear of retaliation.
- Staff Code of Conduct: sets out the actions and behaviour expected of employees to always maintain highest ethical and professional standards.
- Financial Regulations and Fraud Policy & Response Plan: All business activities must be conducted with integrity and to the highest ethical standards. The college will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.
- Procurement Policy: The college is committed to improving its practices and to ensure due diligence procedures are applied to its current and potential suppliers.
- Recruitment & Selection Procedure (inc DBS & KCSiE): Temporary staff recruited indirectly by the college are engaged via reputable, pre-approved agencies. Pre-recruitment checks

are conducted on all permanent/fixed term employees, as per Keeping Children Safe in Education requirements, before appointments are made.

- Safeguarding Policy and Procedure (including Child Protection & Prevent): It is everybody's responsibility to ensure that the college provides a safe environment for its students and identifies any who may be in need.

## 5. Supply chains

The college purchases a wide range of goods and services, which include:

- Facilities & construction
- Professional services including outsourcing and partnership arrangements
- IT and communications
- Catering & food supplies
- Curriculum supplies including books, workshop materials,
- Marketing & printing

All goods and services are purchased in accordance with the college's financial regulations and public procurement law, and includes sourcing via government frameworks and consortia.

The college is committed to ensuring that there is no modern slavery and human trafficking within the organisation and it expects the same high standards from its suppliers.

## 6. Statement

The college will:

- Comply with legislation and regulatory requirements and ensure that staff are not exploited and that employment, health & safety and human rights laws are adhered to.
- Develop awareness of modern slavery and human trafficking issues amongst staff and provide training where deemed necessary.
- Not use suppliers who do not ensure that slavery and human trafficking is not taking place within their business.
- Identify, assess and monitor potential risks in its supply chains by updating its standard terms and conditions.

## 7. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes East Sussex College's modern slavery and human trafficking statement for the financial year 1 August 2022 – 31 July 2023.

This statement has been approved by the Executive team.



Hannah Caldwell  
Chief Operating Officer  
East Sussex College