



## **Modern Slavery Statement**

### **INTRODUCTION**

The Park College is committed to providing outstanding educational opportunities for all our students. The Park College is a post 19 specialist provider.

This statement sets out The Park College's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement is written with reference to the Modern Slavery Act 2015.

The Park College is committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

This statement covers the activities of The Park College.

Students at The Park College have a range of learning abilities and additional needs including autism and moderate learning difficulties.

The Park College is led by the acting principal of The Park College and senior leaders from Spa Education Trust. The board holds ultimate responsibility for the active management of risk within the organisation, with functions and responsibilities delegated to the acting principal.

The principal reports to the board each half term. The board has responsibility for overseeing risk management within The Park College as a whole.

### **Countries of operation and supply**

The Park College operates only in the UK.

### **High-risk activities**

Within the education sector, the areas typically seen as being at high risk of slavery or human trafficking are cleaning, catering and agency workers, due to the potential for

companies to source cheap labour from countries at risk. Modern slavery also encompasses areas such as child criminal exploitation and child sexual exploitation, and thus has obvious safeguarding implications for the students who attend the college.

## Responsibility

The Park College's anti-slavery initiatives include:

- **Risk assessments:** The Park College operates clear risk assessment and risk management processes. The college has a risk register for all school-based decisions which may create a risk to the college. Due regard is always given to decisions when recruiting and purchasing to consider the price versus quality. The Park College carries out a value for money process when purchasing anything over £5k.
- **Investigations/due diligence:** any concerns regarding slavery or human trafficking will be brought to the attention of the relevant principal and the board. This will then be raised with the relevant authorities via the Gangmasters & Labour Abuse Authority (GLAA).
- **Training and awareness:** All staff will complete relevant training to raise awareness during staff induction. Those directly involved in the procurement chain will undertake specific appropriate and regular training and disseminate this as appropriate.

The notion and practice of safeguarding underpins diverse aspects of our practice. The Park College operates a comprehensive suite of policies and procedures intended to safeguard students, staff and wider stakeholders from risks including those related to modern slavery.

Relevant policies include:

- **Whistleblowing Policy:** The Park College encourages all its staff, students and stakeholders to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for people to make disclosures, without fear of retaliation. Staff and stakeholders who have a concern regarding slavery or human trafficking can make a disclosure via our whistleblowing procedure.
- **Staff Code of Conduct:** every member of The Park College staff is expected to uphold the highest standards of good conduct while carrying out their duties: this means acting with integrity, professionalism, compassion and sensitivity in every aspect of their working lives.
- **Finance Regulations:** The Park College is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their

use of labour. The Park College works with suppliers to ensure that they meet the standards and improve their workers' working conditions. Serious violations of the way in which a supplier conducts their business arrangements could lead to the termination of the business relationship.

- **Recruitment & Selection Policy:** The Park College adheres to safer recruitment practices as laid out in Keeping Children Safe in Education (2021). When recruiting new staff, The Park College carries out all necessary pre-employment checks including identity checks and verifying a person's right to work. Additionally, The Park College uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Child Protection, Adult Protection & Safeguarding Policy:** Modern slavery presents a variety of safeguarding risks to those involved, including (but not limited to) child criminal exploitation and child sexual exploitation as well as substance misuse, human trafficking and violence. The Park College operates clear and comprehensive safeguarding policies and procedures in line with national guidance and law. The Park College has a Designated Safeguarding Lead (DSL) who is responsible for managing all safeguarding and child protection/adult protection concerns within the college. DSLs receive regular supervision, training and support from the DSL for Spa Education Trust. Safeguarding is everyone's responsibility and all The Park College staff receive regular, relevant training around both general and specific safeguarding issues, including risks associated with slavery and human trafficking and how to report any and all concerns.

## Due diligence

Spa Education Trust acts on our behalf to undertake due diligence when considering taking on new suppliers. Due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Creating a risk profile for any high risk supplier.

## Performance indicators

The Park College has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result The Park College:

- requires all staff working in procurement along with any other key purchasing personnel to have completed training on modern slavery;
- continues to develop a system for supply chain verification, whereby The Park College evaluates potential suppliers before they enter the supply chain; and
- Continues to review and evaluate its existing supply chains, whereby The Park College evaluates all existing suppliers on an on-going basis but particularly as contracts become renewed and the preferred supplier list is collated.

We will use the following approaches to measure how effective we have been to ensure slavery and human trafficking is not taking place:

- Use of supplier selection process for new suppliers;
- Requalification process for our existing suppliers deemed at risk, to include revised background checks and demonstration that the supplier has its own checks in place.

This will be reported to the board as required.

## **Training**

The Park College requires all staff within procurement and directly involved in the purchase chain, as well as HR staff, to complete training on modern slavery.

For staff working in supply chain managers and HR professionals, The Park College modern slavery training covers:

- purchasing practices which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative; what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps The Park College should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from supply chains.

## **Awareness-raising programme**

As well as training staff, The Park College has raised awareness of modern slavery issues by distributing HELP flyers and Gangland victim posters on our intranet, along with a resource section showing the DfE/GLAA video.

The posters and emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

## **RELATED POLICIES AND PROCEDURES**

Safeguarding Policy  
Equality & Diversity Policy  
Staff Code of Conduct  
Whistleblowing Policy

This policy is agreed by the Board of Directors.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Signatory name: \_\_\_\_\_

Review Date: June 2024