



Modern Slavery Act Policy

College Policy No **PT22**

Approved by

Steven Taylor
Vice Principal

Signature

Date

15 April 2019

Policy effective from

15 April 2019

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

Contents

1. Purpose.....	3
2. Scope	3
3. Policy Statement	3
4. Ensuring Compliance.....	4
5. References.....	6
Appendix 1 - Modern Slavery Act 2015	7
Structure & Supply Chains.....	7
Appendix 2 - Modern Slavery Act 2015 Training and Awareness.....	8

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

1. Purpose

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms including servitude, forced or 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.
- 1.2 The policy outlined in this document is intended to ensure that Dundee & Angus College (the “College”) meets its obligations under the terms of the Modern Slavery legislation whilst doing what it can to ensure that there is no modern slavery or human trafficking in the College’s supply chains or any other part of our business. The statement reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place within our supply chains.

2. Scope

- 2.1 This document defines the framework within which our policy will be managed for all staff employed by the Board of Management of the College. These terms will also apply to seconded staff, contractors, consultants and others working on behalf of the College, and to members of the Board of Management.
- 2.2 This policy reflects the College commitment to mitigate any risk of human trafficking or modern slavery taking place in the College or in its supply chain.
- 2.3 The College has endeavoured to ensure that it meets the requirements of the Act in the following areas:
 - Modern Slavery Policy
 - Structure and Supply chains
 - Due Diligence Processes
 - Risk Assessment
 - Measuring Effectiveness
 - Training and Awareness for Staff

3. Policy Statement

- 3.1 The aim of the College is to provide its communities with the highest possible standard of education, training and learning. The College has a commitment to ensuring that staff work effectively in the best interests of the College and that the College, as a whole, demonstrates a high standard of governance, management, academic integrity and financial propriety.

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

- 3.2 Any failing in the propriety of governance, management, financial control or academic integrity can have serious consequences for the success of the College as a whole and for the value placed on the services the College provides. As a result, all staff should be aware that the College will adopt a zero tolerance approach to slavery and human trafficking and that there should be an understanding of the risks of modern slavery and human trafficking in our supply chains and in our day to day business operations.
- 3.3 We engage with a number of private and public sector organisations in carrying out our business and regularly undertake activities by partnering with these organisations. Our procurement activities take place primarily in Scotland, and our contractors and suppliers are predominantly UK or EU based.
- 3.4 We carry out our procurement activities in accordance with a clear Procurement Strategy and related Policy which are developed in conjunction with Advanced Procurement for Universities and Colleges (APUC) and aligned to the EU Procurement Directives and Procurement Reform (Scotland) Act 2014.
- 3.5 We expect our partners, suppliers and contractors to ensure that their goods, materials and employee-related supply chains comply with the Modern Slavery Act 2015 and are transparent, accountable and auditable in their business.

4. Ensuring Compliance

4.1 Responsibility and Risk Assessment

- The College has an agreed management responsibility which is fully supported by the Executive and Board of Management.
- We have included the Modern Slavery Act 2015 within our Strategic Risk Register to ensure an ongoing risk awareness and to ensure the risk continues to be flagged, assessed and appropriately addressed.

4.2 Procurement

- We have ensured that consideration of potential risks and issues in respect of slavery and human trafficking is embedded within our procurement processes (see Appendix 1 – Modern Slavery Act 2015 – Structure and Supply chains).
- We have added a provision to our procurement documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act.
- Relevant documents can be found on the College website

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

4.3 Training and Awareness

To ensure full awareness of, and compliance with, the Modern Slavery Act and the requirements, the College

- Will ensure that this Policy is brought to the attention of all employees;
- Will ensure that all staff are aware of the Act and how to potentially identify human trafficking through the use of appropriate information throughout the campuses and on the College web portal. Available resources are noted in Appendix 2.
- Intends to implement training throughout the College to help staff understand how to identify and report the signs of modern day slavery, ensure business practices are compliant and help to ensure that staff can do their part to prevent human trafficking and modern day slavery.

4.4 Due Diligence Activities

- Mitigate the risk of slavery and human trafficking in our supply chains through our commitment to APUC
- Monitor potential risk areas in our supply chains and recognise the high risk supply areas in industry and supply pools.
- Identify and assess potential risk areas in our supply chains by requesting the provider to commit to the APUC Supply Chain Code of Conduct.
- Ensure all suppliers of goods and services with a turnover in excess of £36M per year have published a Modern Slavery statement.
- Current or potential suppliers of goods and services that fall below the threshold of £36M are required to demonstrate their commitment to the APUC Code of Conduct with respect to their organisation and their supply chain.
- Provide protection to anyone who provides or reports information about activities which may expose human trafficking or modern day slavery.

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

4.5 Related Policies

The following policies, which are aligned with fair equitable treatment of people, are readily accessible to all staff via the College Portal.

- Equality and Diversity
- Dignity at Work – covers, Harassment, Bullying, Victimisation and Discrimination
- Recruitment and Selection
- Risk Management
- Disciplinary Policy
- Public Interest Disclosure – Whistle Blowing

5. References

Information and advice regarding the Modern Slavery Act and its statutory and legal requirements applicable to employment matters may be sought by contacting the Vice Principal People and Performance.

5.1 Associated Documentation

<i>Modern Slavery Act 2015</i>	http://www.legislation.gov.uk/ukpga/2015/30/contents/scotland
<i>Human Trafficking - Scotland</i>	https://www.gov.scot/policies/human-trafficking/
<i>D&A Procurement Strategy</i>	https://dundeeandangus.ac.uk/dmsdocument/400
<i>Board of Management</i>	https://dundeeandangus.ac.uk/about-us/governance/
<i>Report and Financial Statements</i>	https://dundeeandangus.ac.uk/about-us/report-and-financial-statements/
<i>APUC Supply Chain</i>	http://www.apuc-scot.ac.uk/#!/Suscode

MODERN SLAVERY ACT POLICY

Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

Appendix 1 - Modern Slavery Act 2015 Structure & Supply Chains

Dundee and Angus College is committed to carrying out procurement of goods and services in an environmentally, socially, ethically and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to this commitment.

Much of the College's procurement of goods and services are carried out through APUC (Advanced Procurement for Universities and Colleges) Ltd of which it is a member.

APUC require all suppliers to sign a supply chain code of conduct to acknowledge their compliance with the code in respect of their organisation and their supply chain. The code of conduct includes confirmation that the supplier does not use forced, involuntary or underage labour, provides suitable working conditions and terms and treats employees fairly.

As part of the College's standard procurement documentation a pass/fail question: "Does the supplier meet its obligations under the Modern Slavery Act?" requires to be answered. A further optional (non-mandatory) question allows the tender to be scored on a graded basis as part of the award criteria: "What measures will you take to ensure slavery and human trafficking is not taking place in your supply chains?"

The College utilise the [APUC Supply Chain Code of Conduct](#) for suppliers who are sourced directly by the College and ask all potential suppliers to respond to the pass/fail question above.

Dundee & Angus College Financial Year covers 12 months from 01 August through 31 July of the following year. The current Financial Report for 2017/2018 can be found on the College Web Site.

<https://dundeeandangus.ac.uk/about-us/report-and-financial-statements/>

[D&A Procurement Strategy.pdf](#)

<https://dundeeandangus.ac.uk/dmsdocument/400>

MODERN SLAVERY ACT POLICY



Prepared by:	C Mackie	Approved by:	S Taylor	Revision Due Date:	31.01.2021
--------------	----------	--------------	----------	--------------------	------------

Appendix 2 - Modern Slavery Act 2015 Training and Awareness

Dundee and Angus College will ensure that all staff are aware of the Modern Slavery Act through the Portal for all staff to access. The information will help staff to recognise where situations which may involve human trafficking and what to do if human trafficking is suspected. The information is presented in videos, training booklets and infographics provided on the www.gov.scot/policies/human-trafficking/ website

Guidance and Information

[Modern Slavery Briefing](#) - An brief overview of what Modern Slavery

[Modern Slavery Awareness Booklet](#) This guidance is aimed at a broad range of public sector staff who could potentially witness indicators of modern slavery

<https://www.gov.scot/publications/human-trafficking-resources/> Information regarding Modern Slavery and Human Trafficking can be found in different languages on this website

Helpline

The Modern Slavery Helpline is 08000 121 700 or online at: www.modernslaveryhelpline.org This helpline provides information and advice about modern slavery, is a 24 hour telephone reporting line. Online reporting can be made through the website.

<https://www.modernslaveryhelpline.org/media/audio-visual> - This site contains several video presentations to help you spot the signs of Modern Slavery