

MODERN SLAVERY STATEMENT

Statement at the end of the 2024/2025 Financial Year

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps South Lanarkshire College has taken during the financial year ending 31 July 2025 to ensure that modern slavery and human trafficking are not taking place in our organisation or supply chains.

South Lanarkshire College is the largest education provider in South Lanarkshire and is committed to making a positive impact beyond teaching and learning, as well as upholding the highest standards of ethical conduct and social responsibility, ensuring that we contribute meaningfully to the lives of local residents. The College is committed to preventing modern slavery and human trafficking in all its forms with the institution and its supply chains.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. South Lanarkshire College is committed to acting ethically, with integrity and transparency in all business dealings, and to putting in place effective systems and controls to safeguard against any form of Modern Slavery taking place within the organisations or our supply chains.

South Lanarkshire College is a regional college following ministerial approval to dissolve the Lanarkshire Region on 30 July 2025.

Commitment

The College recognises its responsibility to take a robust approach to modern slavery and human trafficking. We are wholly committed to acting ethically, upholding human rights and enforcing effective controls to ensure slavery and human trafficking are not taking place anywhere within our organisation or in our supply chains.

Our Board of Management, the College's governing body, is committed to delivering high standards of corporate governance. A key element of good governance is ensuring the College operates in a socially responsible way.

The College implements a range of measures, and regularly reviews their effectiveness, to ensure we comply with all applicable laws and regulations and employ the highest ethical and professional standards. We also support the UK Government's Action Plan to implement the United Nations Guiding Principles on Business and Human Rights. The College is committed to:

- Conducting business ethically and transparently.
- Upholding human rights and fair working practices.
- Preventing exploitation, forced labour, and trafficking in our operations and supply chains.
- Working collaboratively with suppliers, sector partners and public agencies to strengthen modern slavery prevention

The Organisational Structure and Supply Chain

South Lanarkshire College (SLC) is now a regional College and is a leading provider of further and higher education and has an annual turnover of c£19m which, whilst not above the required threshold under section 54 of the Modern Slavery Act 2015, is publishing this statement for reasons of best practice.

SLC has circa 5,000 students enrolled on a mix of full-time, part-time, day release and evening courses and deliver programmes on the Scottish Credit and Qualification Framework (SCQF) from levels 1 to 8.

The College offers a range of courses across eight curriculum areas:

- Building Services Engineering
- Business, Events and Public Services
- Carpentry and Joinery
- Creative Industries
- Early Education and Social Science
- Health, Social Care and Science
- Inclusive Learning and Languages
- Wet Trades

The new [Strategy 2030](#) sets out the College's mission of:

"Delivering excellence in skills-based education to the workforce of the future creating social and economic value for individuals, businesses and the communities we serve through first-class teaching, learning and support."

The new strategy 2030 now supersedes the former [SLC College Strategy 2020-2025](#).

The Supply Chain

The supply chain structure at the College has 4 main categories of spend: Estates, ICT, Professional Services and Catering Services/Supplies.

The main commodities which carry risks are office supplies, laboratory consumables, ICT equipment and some estates services. A significant proportion of procurement is with suppliers who are pre-approved either by a purchasing consortium or through public tenders managed by our Procurement department. If evidence were found indicating modern slavery in our supply chains, the College recognises its responsibility to work with others to address this immediately.

The College has signed up to the National Recognition & Procedures Agreement (NRPA) for both teaching and support staff. Pay and Terms & Conditions are negotiated at a national level between College Employers Scotland and the respective Trade Unions. The College has two representatives who attend the general meetings of College Employers Scotland. Although not mandatory for colleges, Support Staff at a national level have agreed to consider the Public Sector Pay Policy which covers Salary and Terms & Conditions. In addition, the College has achieved Living Wage accreditation, which includes directly employed staff, outsourced contractors.

Policies on Slavery and Human Trafficking

The College is committed to ensuring that there is no Modern Slavery or human trafficking in our supply chains or in any part of our business. There are a range of policies in place supported by processes, practices and procedures which reinforce the College's commitment

to human rights and ethical practices and set out how the College will minimise the risk of modern slavery and human trafficking, including:

- **Procurement Policy and Procedure and Procurement Strategy:** Ensuring ethical procurement practices, outlined below that prevent exploitation.
- **Equality, Diversity and Inclusion Policy:** The College is committed to providing an environment that is free from bullying, harassment, victimisation and discrimination, in which everyone is treated with dignity and respect.
- **Recruitment and Selection Policy:** This is relevant to Slavery and Human Trafficking.
- **Staff Code of Conduct:** Setting expectations for the behaviour of staff and the College's values.
- **Anti-Bribery & Corruption Policy:** Preventing unethical business practices and ensuring transparency in our work.
- **Public Interest Disclosure (Whistleblowing) Policy:** Encouraging staff to report concerns about unethical practices, protecting them when they do and investigating matters thoroughly.
- **Safeguarding Policy:** Protecting vulnerable individuals within the College's community every day.

All policies include the requirement for an Equality Impact Assessment to take place.

In addition, the Single Procurement Document (SPD) is used for relevant procurements which incorporates questions on whether a supplier has breached any of their obligations in relation to environmental, social and labour laws.

The College has also adopted the 'Sustain Supply Chain Code of Conduct' created by APUC (Advanced Procurement for Universities and Colleges) Ltd and this is used in procurement exercises. The Code of Conduct includes confirmation that the supplier does not use forced, involuntary or underage labour, provides suitable working terms and conditions, and treats employees fairly. APUC's Slavery Statement can be found [here](#).

Processes on Slavery and Human Trafficking

The College is committed to carrying out the 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.

The College will use its best endeavours to ensure the procurement of goods and services is carried out through APUC of which they are members.

APUC leads collaborative tendering activity and has a wide range of framework agreements across a variety of category areas. All the categories for APUC frameworks that the College has used have already undergone an analysis of the specific commodity areas and supply chains to assess potential risks of Modern Slavery.

Where it is not possible to use a collaborative framework agreement, a standard Invitation to Tender template is used with applicable terms and conditions requiring contractors to comply with current legislation in relation to the Equality Act 2010, National Minimum Wage Act 1998 (as amended), Health & Safety at Work Act 1974 (as amended) and the Modern Slavery Act 2015. The terms and conditions include a clause on Anti-Slavery and Human Trafficking which outlines the expectations and obligations of the Contractor and any applicable subcontractors.

Recruitment checks are carried out by the Human Resources Teams at the College to ensure compliance with the provisions of the Immigration, Asylum and Nationality Act 2006, which state that at the time of recruitment an employer must be able to demonstrate that the person to be appointed has permission to work in this country. Therefore, all external candidates

invited to attend interview for a post in the College must produce evidence of their entitlement to work in the United Kingdom.

Offers of employment are also subject to a satisfactory PVG Scheme Record and references satisfactory to the College.

Risk Assessment and Management

For relevant collaborative and local tenders, a risk assessment using the APUC Prioritisation Tool or APUC Sustainability Test is carried out to assess if the commodity is exposed to Modern Slavery and trafficking.

APUC uses its Supply Chain Management (SCM) Tool to verify that framework suppliers have published Modern Slavery Statements in line with the Modern Slavery Act 2015. It has adopted a system, EcoVadis, an internationally recognised sustainability rating company, whose system will provide a further proportionate assessment on suppliers' ethical, environmental, and social compliance within the framework agreements.

The College has adopted the EcoVadis sustainability ratings agency, which allows the College to review sustainability audits within their supply chain.

The College has invited all local, contracted suppliers with a recurrent regulated spend to complete Section 1 of the SCM Tool. This section has a module on Ethics & Environment which the supplier is requested to provide information on their Modern Slavery Statement and their Living Wage status.

In partnership with Police Scotland, tenderers are requested to provide declaration of Non-Involvement in Serious Organised Crime and Non-Involvement in Human Trafficking where it is considered relevant and proportionate.

The College is also an affiliate member of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry, through socially responsible purchasing in Europe.

Training on Modern Slavery and Trafficking

The Procurement Manager participates in the Procurement Strategy Group for Colleges where responsible procurement updates are part of the agenda. Online resources on the APUC Responsible Procurement Website provide current information, training and sector guidance.

The Procurement Manager delivered procurement awareness training to the Heads of Departments/budget holders within the College which included considerations of sustainable procurement and the Modern Slavery Act.

The Student Funding Team at the College has undertaken training in document fraud and immigration awareness, which was delivered by the Home Office.

Plans for the Future

The College is committed to better understanding its supply chains and working towards greater transparency and responsibility towards people working in them. The College will continue to ensure risk assessments are carried out using the APUC Prioritisation Tool or the Sustainability Test and address any risks in our tendering processes through key evaluation criteria on high risk areas.

The College will continue to promote the use of the Sustain Supply Chain Code of Conduct in our local tenders helping suppliers to understand the importance of compliance with ethical standards. The College shall seek to increase the use of APUC framework agreements and

work with APUC to measure ethical compliance through the SCM and EcoVadis Tools. Where relevant and proportionate, we shall look to use these tools for local, contracted suppliers.

The College will continue to invite local, contracted suppliers to complete Section 1 of the SCM portal.

The Procurement Manager shall continue to attend APUC responsible procurement training which shall include modern slavery and related topics.

The College will review procurement training delivered to stakeholders to ensure it captures current sustainable procurement practices and continuous promotion of Modern Slavery awareness in the supply chain.

The College will maintain a risk register and will prioritise the highest-risk categories for supply chain mapping and further analysis. As part of identifying and mitigating risk the College commits to:

- Monitor, identify and assess potential risk areas in the supply chains.
- Mitigate the risk of slavery and human trafficking occurring in the supply chains.
- Protect whistleblowers, safeguard vulnerable people and report unethical conduct.
- Where possible, build long-standing relationships with supply chains to ensure these entities have and follow suitable anti-slavery and human trafficking policies and processes.
- Continue to deliver relevant training and awareness sessions, facilitated by the Procurement department and APUC, to staff.

SLC will review its policies and procedures on an annual basis ensuring they reflect our commitment to acting ethically and with integrity in all our business relationships and our supply chains.

Approved: South Lanarkshire College Board of Management

Signed: 

Date: 9 December 2025