

Anti-slavery and human trafficking statement

1: Opening statement from senior management

Heart of Yorkshire Education Group (the 'Group') is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

2: Structure of the organisation

The Group is a statutory corporation formed under the Further and Higher Education Act 1992 and an exempt charity. It is made up of three general further education colleges with campuses in Castleford, Selby and Wakefield and owns a subsidiary non-trading company, Heart of Yorkshire Education Group Limited. It employs over 900 people.

The Group has a global annual turnover of £42 million. To find out more about the nature of our business, please click <https://www.heartofyorkshire.ac.uk>.

In order to carry out the business of a group of general further education colleges, we work with a range of suppliers of goods and services that support the Group's teaching activities. These goods and services include but are not limited to the following:

- Estates, e.g., construction, facilities management and maintenance.
- Professional Services, e.g., temporary staff and consultancy.
- IT, e.g., telecoms, hardware and software.
- Commodities, e.g., teaching and office supplies.

3: Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Financial Regulations and Tender and Contract Management Procedures – These help to ensure that the Group adheres to strict procurement procedures which include requirements to:
 - ensure an ethical approach to the procurement of all goods and services;
 - carry out appropriate due diligence;
 - consider suppliers approved by the purchasing consortia of which the Group is a member which have made assurances to their members regarding their suppliers' commitment to the prevention of modern slavery and human trafficking; and
 - enter into contractual agreements with suppliers which have been reviewed by the College's Legal Officer to ensure that such suppliers have made appropriate promises regarding their adherence to their legal obligations.
- Whistleblowing (Public Interest Disclosure) Policy – Where there are concerns about malpractices or improprieties that are not adequately covered by the Group's other policies or procedures, staff are encouraged to make a public interest disclosure. This policy, therefore, provides an additional means for people to raise concerns about a supply chain or an individual who may be at risk.

- Employment policies – The Group’s carries out appropriate vetting checks when it recruits new employees to ensure their employment complies with relevant employment laws. The Group is also a ‘Living Wage’ employer which means that it has committed to pay its staff at or above the ‘Living Wage’ rate.

We also make sure our suppliers are aware of our policies and adhere to the same high standards.

These policies have been developed and approved by the Groups Board, committees and Executive Team.

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- The Group requires suppliers to complete a pre-qualification questionnaire (‘PQQ’) in respect of services exceeding a specified threshold value. The Group’s policies point to the Government’s guidance on the production of such PQQs which include questions regarding suppliers’ adherence to modern slavery and human trafficking laws, giving the Group the opportunity to reject such suppliers on the basis of unsatisfactory responses. Below threshold, suppliers may be asked to provide information relating to their compliance with such laws where the Group identifies a genuine risk.
- The Group is a member of certain purchasing consortia which make assurances to its members regarding their suppliers’ adherence to the law regarding modern slavery and human trafficking. For example, Crescent Purchasing Consortium has confirmed that it has carried out checks of its suppliers to make sure they have procedures in place to risk assess and evaluate their own supply chains to minimise the risk of modern slavery or human trafficking occurring. Additionally, it has also introduced an evaluation of bidders’ modern slavery elimination practices when tendering for new frameworks Those purchasing for the Group are required to consider consortia approved suppliers.
- At the point of recruitment, the Group ensures appropriate checks have been carried out on all prospective employees including those supplied by the Group’s preferred recruitment agencies.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

5: Risk and compliance

We do not consider that we operate in a high-risk sector or location given the type of goods and services we procure and the locations from which we procure them. However, we continually evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by reference to our due diligence procedures.

We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. Where we have identified a potential risk, we will immediately seek to terminate our relationship with the relevant supplier.

6: Training

We invest in educating our staff and through our training programmes, employees are encouraged to identify and report potential breaches of the law.

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to consider the following further steps to tackle slavery and human trafficking:

- The introduction of an anti-slavery and human trafficking policy.
- A review of the Group's due diligence procedures to ensure our suppliers' compliance with modern slavery and human trafficking laws.
- A formal review of the risk of modern slavery and human trafficking in the Group's supply chains.
- Implementation of key performance indicators to measure how successful the Group has been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.
- Mandated modern slavery and human trafficking training to staff regularly involved in the procurement of goods and services.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year commencing 1 August 2021 and ending 31 July 2022.

This statement was approved by the Board on 12 December 2022.

Signature: 

Chair of Governors

Heart of Yorkshire Education Group

Date: 12.12.2022