



## **Slavery and Human Trafficking Policy**

### **1. Introduction**

This policy is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that Newham College has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

### **2. The College structure**

Newham College is based in East London and its core business is education and training. Newham College has approximately 13,600 students and 600 staff. The College is currently supported by Tenet Education Services who provide procurement and contracting function with transactional purchasing devolved to individual departments.

### **3. Implementation**

Newham College is committed to acquiring goods and services for its use without causing harm to others. In doing so, Newham College is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

In implementing this approach Newham College supports the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

### **4. Supply Chains**

Newham College's supply chains are managed under the following categories:

Administration  
Curriculum  
Facilities Management  
ICT & Telecoms  
Marketing  
Personnel  
Professional Services  
Travel & Transport



The principal areas which carry material risks are office supplies, consumables, ICT and AV equipment, and some estates services, such as cleaning and security services. Procurement will support Newham College's approach to the Modern Slavery Act 2015. In particular for these spend categories where risk of modern slavery and human trafficking are more common, due diligence will be undertaken to assess how suppliers minimise the risk of modern slavery and human trafficking occurring in the supply networks.

Newham College's procurements follow one of two pathways: collaborative, through regional HE purchasing consortia, or in-house tendering and contracting. Newham College actively engages with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

Newham College's in-house tendering and contracting processes include some prequalification clauses which address the London Living Wage, and our major soft service contracts already include this requirement. Our standard terms and conditions have clauses covering modern slavery and human trafficking.

Tenet Education Services use the Responsible Procurement Code as a tool to assess the risks and to monitor progress with mitigation.

## **5. Monitoring**

As part of this reporting exercise in this and the coming years, Newham College expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

Contractors are required to demonstrate to the College how they are minimising the risk of modern slavery and human trafficking occurring in the supply networks. The College will work with its suppliers to monitor these supply chains that have been identified as a potential risk and take appropriate action as necessary.