

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

As required by the Modern Slavery Act 2015, this statement sets out Leicester 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 relates to actions and activities during the financial year 1 August 2024 to 31 July 2025.

As part of Further Education sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. It is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Leicester College is a Further Education College. It operates in the United Kingdom and had a turnover of £55.4 million in 2024/25. The College delivers education and training to around 12,000 students annually including training delivered on company premises, apprenticeships and classroom-based activity. The majority of its students live in Leicester and Leicestershire. Students also undertake work placements in businesses and other organisations across the local area.

Leicester College has a supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning and transport. It also has one subcontractor which delivers education and training on its behalf.

The College is aware of its responsibility under the Act and has a range of policies, risk assessments, due diligence and training to ensure its supply chain complies with the Act.

NETWORKS AND REPORTING

The College has retained close links and communication with the local police and City Council to ensure that any cases of human trafficking or modern slavery could be reported or responded to promptly and ensure support was provided for any affected individuals. No cases were reported in 2024/25.

The College is represented on the Leicester, Leicestershire and Rutland Strategic Partnership Board through which it receives reports on serious organised crime, threats and current local operations. Organised Immigration Crime is treated as a serious organised crime threat under the UK's Strategic Policing Requirement and is linked to modern slavery, human trafficking and exploitation in the grey economy. The College therefore remains alert to the potential for students and staff to be affected by modern slavery and human trafficking has continued to monitor and support vulnerable individuals including unaccompanied young asylum seekers who may be at greater risk.

RELEVANT POLICIES

Business Operations

Leicester College has a number of policies that assist in preventing slavery, human trafficking and other forms of exploitation in its operations, including:

<ul style="list-style-type: none">• <i>Subcontracting and Tendering Policy (FF005)</i>• <i>Environmental and Sustainability Policy (EC019)</i>• <i>Anti Money-Laundering Policy (FF008)</i>• <i>Due Diligence Policy (GP014)</i>	<p>Leicester College is committed to ensuring that its subcontractors and suppliers adhere to the highest standards.</p> <p>Due diligence is undertaken on all partners.</p>
<ul style="list-style-type: none">• <i>Safeguarding in Recruitment Policy (HR039)</i>• <i>Recruitment and Selection Policy and Procedures (HR027)</i>• <i>References Policy: recruitment of staff (HR030)</i>• <i>Volunteers Procedure (HR037)</i>	<p>Leicester College has established recruitment processes to ensure that comprehensive pre-employment checks take place relating to DBS, Barring List, proof of identity, right to work, references and medical clearance.</p>
<ul style="list-style-type: none">• <i>Employee Wellbeing Policy (HR038)</i>• <i>Employee Standards and Code of Code of Conduct (HR000)</i>• <i>Equality Diversity and Inclusion Policy (SS008)</i>• <i>Low Level Concerns Policy (HR053)</i>• <i>Grievance Policy (HR019)</i>• <i>Domestic Abuse Policy (HR052)</i>• <i>Preventing and Responding to Violence at Work Policy (HR041)</i>• <i>Sexual Harassment Policy (HR035)</i>	<p>Clear policies are in place to ensure that staff receive fair treatment and support from the point of application and throughout their employment. Leicester College's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation. There are policies that enable staff to raise any complaints, grievances or other matters of concern that they have, and the College encourages membership of a trades union who can provide representation, if necessary. Staff also have access to an Employee Assistance Programme and 24 hour helpline.</p>
<ul style="list-style-type: none">• <i>Public Interest and Whistleblowing (GP006)</i>	<p>The College encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.</p>

Student Support and Safeguarding

The College also has in place the following policies which are designed to ensure that students are protected from slavery and human trafficking:

<ul style="list-style-type: none">• <i>Safeguarding and Prevent Policy (SS020)</i>• <i>Student and Apprentice Behaviour and Conduct Policy (CR008)</i>• <i>Student and Apprentice Sexual Misconduct Policy (SS027)</i>• <i>Low Level Concerns Policy (HR053)</i>	All staff are required to undertake safeguarding training. The College also has in place a dedicated Safeguarding Team and procedures for supporting students at risk. Additional resource in the form of another Safeguarding Officer was introduced during the year.
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The College uses an online monitoring tool (Smoothwall) across College devices and alerts for any concerning searches, content or language. This is reviewed and triaged by the Smoothwall team and alerts are sent to the Safeguarding team (for students) or HR (for staff). Where there is a 'Level 5' alert which suggests an immediate risk, the Safeguarding Team or HR are notified by telephone.

This and the College's other extensive safeguarding processes ensure that any concerns relating to exploitation or modern slavery, including referrals from outside the College, are passed promptly to the College's safeguarding team. Members of the team then liaise with any external agencies including social services or the Police where necessary.

RISK ASSESSMENT

The main areas of risk in relation to slavery and human trafficking arise from the following areas:

- **Supply of goods and services including through supply chains which may have involved human slavery, trafficking and other forms of exploitation.** To mitigate this risk, the College actively promotes the use of consortia when procuring goods and services, as these already have in place stringent and detailed contracts and due diligence processes to ensure suppliers are not involved with slavery, human trafficking or any other illegal activity. Potential suppliers with whom the College contracts directly are also required to provide evidence of compliance with the requirements of the Modern Slavery Act.
- **Students studying with the College who may be subject human slavery, trafficking and other forms of exploitation outside of the College environment.** These students may disclose this information to College staff. The College's safeguarding and reporting process will ensure that where disclosed, such information will be dealt with appropriately and referred as required. Checks are undertaken with prospective work placement venues to ensure students are not placed at risk.
- **Staff employed by the College may also be subject to human slavery and other exploitation outside the College.** The College's recruitment policies together with its employment policies and processes provide

opportunity for this information to be disclosed and for subsequent action to take place, as appropriate.

- **Training for some sectors which may be deemed to be higher risk specifically the textiles and construction industries.** Any outreach work in textiles companies is organised through Jobcentre Plus and involves only reputable companies. No companies previously identified as having poor employment practices were used.

DUE DILIGENCE AND CONTRACTS

Leicester College undertakes appropriate financial and due diligence checks when considering taking on new suppliers and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

Standard contracts include references to modern slavery and require companies to complete modern slavery declarations.

TRAINING AND AWARENESS RAISING PROGRAMME

Leicester College will ensure that key staff undertake training on modern slavery, where deemed necessary and will engage with external training providers, as appropriate. Trafficking and modern slavery was included in a safeguarding briefing to staff and the Safeguarding training which is mandatory for all staff now includes specific reference to modern slavery and trafficking. In addition, there has been awareness raising for students through the Votes for Colleges mechanism and through the personal development framework which includes advice on how to keep safe.

The College will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues.
- How students can keep safe and refer any concerns about trafficking or Modern Slavery.
- What external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by Leicester College's Governing Body on 11 December 2025 and will be reviewed and updated annually as part of the review of the Financial Statements.



DANIELLE GILLETT
CHAIR

11 December 2025



SHABIR ISMAIL
PRINCIPAL/CEO

11 December 2025