



## IEG Modern Slavery Statement 2021/22

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

We are committed to improving our practices to combat slavery and human trafficking in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes Inspire Education Group's response to the requirements of the Act.

### Organisational Structure

Inspire Education Group (IEG) was formed in August 2020 from the merger of Peterborough Regional College and New College Stamford. Together the group aims to deliver a strong educational provision to our local communities.

We have built on the strengths and opportunities created by coming together as a single, larger, more robust college group with one vision, a relevant and more responsive curriculum and an absolute focus on quality, standards, and excellence.

Together as a group, we now have around 1,250 staff, 8,500 Further Education students, 800 Higher Education students and 1,200 apprentices, meaning our IEG community is nearly 12,000 strong. This growth in size, coupled with an annual income of approximately £46 million in 2021/2, creates many more opportunities for us all.

Overseen by the IEG Board of Governors, Peterborough College and Stamford College have been able to preserve their distinctiveness while building on their individual strengths. We continue to offer a broad, responsive curriculum offer at both campuses, developing our further education, apprenticeships and higher education provision and continuing to invest in students and our communities. We are firmly committed to enhancing the potential of our students both during their time with us and into their futures.

During 2021/22 within IEG there were three wholly owned subsidiaries, these being:

- University Centre Peterborough, a higher education provider
- Anglia Professional Training, a professional qualifications training provider
- Quality Resourcing Solutions, a recruitment agency supplying Agency workers

Further information about the College Group may be found on its website

[www.ieg.ac.uk](http://www.ieg.ac.uk) | [www.peterborough.ac.uk](http://www.peterborough.ac.uk) | [www.stamford.ac.uk](http://www.stamford.ac.uk)

### Our Policies

During 2021/22 all key policies for the IEG group were reviewed and approved. As part of this work a modern slavery policy was introduced for the first time, in line with the Modern Slavery Act 2015.

Other relevant policies are:

- Procurement Policy
- Sustainability Policy
- Recruitment Policy

- Whistleblowing Policy

Where the policies form part of the publication scheme these can be found on the web link above. Copies of all policies are available on request by contacting: [FOI@ieg.ac.uk](mailto:FOI@ieg.ac.uk)

### **Supplier Code of Conduct**

IEG aims to develop an approach to procurement which delivers a management of the supply chain that provides value for money, whilst delivering greater social, environmental and economic benefits to support and contribute to the College Groups Vision and Strategy.

We expect commitment, direct involvement and improvement when any supplier begins working with IEG, and ask all suppliers to sign up to the IEG Supplier Code of Conduct. Suppliers applying this code of conduct are expected to comply with national and other relevant law and, where the provisions of law and this code address the same subject, to apply that provision which affords the greater protection.

Key principles include the following:

- Complying with all applicable laws, rules and college policies.
- Avoiding actual and apparent conflicts of interest.
- Maintaining confidentiality of non-public information.
- Dealing fairly with the competition, suppliers and suppliers' own employees.
- Have a genuine commitment to strive to maintain a discrimination and harassment free environment, and demonstrate careful stewardship of the environment.

### **Supplier adherence to our values**

We have zero tolerance to modern slavery. As well as taking mitigating measures through the procurement/contract management process (including adding appropriate pre-qualification/tender questions and standard contract clauses), we have expressed this policy, explained the Modern Slavery Act and the related measures we have added to our processes, at local supplier events.

### **Use of Procurement Frameworks and Due Diligence**

Where possible and practical IEG makes use of pre-tendered frameworks, using organisations who have met a public sector standard, and this has been assessed by teams of procurement specialists. IEG uses the following frameworks:

- Crescent Purchasing Consortium
- Crown Commercial Services
- Furthering Education and Learning in Procurement
- PAGABO
- ESPO

Using pre-tendered frameworks provides IEG with a service that includes due diligence of suppliers, undertaken by a range of procurement specialists, which provides IEG with a wider range of specialist expertise in some supply chains. Where direct tendering is used the due diligence covers financial & legal history, as well as customer references and contract performance evidence.

### **Our Supply Chains**

Our supply chain is large and varied and includes transport provision, examination body fees, product and material suppliers and services from both large and small businesses. The categories identified as being at the highest risk from modern slavery are:

- **Construction**

IEG generally works with local suppliers, and where working with national companies undertakes an active role in the selection of sub-contractors. Contractor management is robust, reducing the likelihood of labour provided by gangmasters.

- **Onsite cleaning services, food catering and hospitality**

Cleaning and food services are directly employed staff, mitigating some of the risk. The food supply chain does pose some risks, as much of the food in the UK is imported.

The only facilities service currently outsourced is Security and that is recently been re-tendered, and due diligence undertaken.

We use robust contractual rights (including an obligation for our supplier to perform various checks on all people supplying services to us), regular governance and management discussions with the supplier, as well as rights to audit the supplier at our request to manage the associated modern slavery risks in the supply of services from these sectors.

- **Technology hardware**

IEG sources a range of technology hardware items including laptops, monitors and peripherals which are typically manufactured in countries such as China, Taiwan, India, Brazil, Mexico, Malaysia and Thailand where modern slavery regulation can be lacking or non-existent.

We recognise the high inherent risks of modern slavery present further down the supply chain of the products, such as, the high risk of child labour in the mining of raw minerals used to make electronic components (such as conflict minerals) and forced labour in the manufacturing of product parts. We therefore utilise public sector frameworks and their expertise and due diligence efforts to clearly outline our expectations.

## **Training and Awareness**

Links to the Procurement team, advice and guidance are readily available to all staff through the internal intranet. There are a number of internal processes and controls to minimise the risk of unauthorised procurement.

## **In Year Developments**

2021/22 in our modern slavery statement we said we were going to undertake the following in the year:

- Risk categorisation of suppliers – This is in place for all new suppliers
- Review of supplier information captured to meet modern slavery requirements, such as location of head office- This is in place for all new suppliers
- Recording of non-compliance with supplier code of conduct – This is undertaken through the Procurement Report

## **2022/23 Developments**

In addition to the above in 2022/23 we plan to:

- Extend risk categorisation to existing suppliers
- Introduce modern slavery questions in the procurement documentation
- Work with student mentor team to increase awareness among students entering the workplace
- Work with IEG's subcontractors to improve their knowledge and awareness of modern slavery
- Review the Treasury Management Policy with a view to ensuring as far as is practicable that IEG investments avoid modern slavery high risk organisations

This statement was reviewed and approved by the IEG Board on 13<sup>th</sup> December 2022