

QUEEN ALEXANDRA COLLEGE

Modern Slavery Statement

1. Introduction

1.1. Queen Alexandra College is a specialist residential college which provides education, supported living and community support services to young people and adults with learning difficulties and disabilities. Local Authorities and the Education, Skills & Funding Agency contract with the College for such services, as well as individual service users. QAC purchases goods, services and works through various supply chain arrangements. It is registered as a company, no: 3387540 and a charity, no: 1065794. The College's Mission Statement is:

QAC creates challenging learning opportunities for people with visual impairment and/or other disabilities to realise their potential to work and to live independently.

1.2. The College is committed to employing staff, engaging with and supporting our students, acquiring goods, services and works for its educational and support purposes, and otherwise conducting its business without causing harm to others. In so doing, we are committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

1.3. The College has a zero tolerance policy in relation to modern slavery and human trafficking and is committed to continuing to work with its partners and suppliers to keep addressing areas of higher risk and concern.

2. Purpose of this statement

2.1. This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by providing assurance to our stakeholders about QAC's policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

3. Identified risks and steps being taken

3.1. The College mitigates the risk of the occurrence of modern slavery in its teams of directly employed staff through strict adherence to its robust HR recruitment and candidate selection policies. Additionally, the College has a Whistleblowing policy through which staff can raise concerns.

3.2. Temporary staff and other staff recruited indirectly by the College are only recruited through established and accredited sources who can provide assurance that they fully comply with the requirements of all legislation relating to the rights and welfare of their candidates and employees.

3.3. Although the risks of students experiencing occurrences of modern slavery or human trafficking through direct contact with the College are low it is

appreciated that whilst living within West Midlands and the surrounding area, they may become aware of such instances or on very rare occasions be entrapped into adopting the life style of a modern slave. In order to mitigate these circumstances the College has in place easily accessible safeguarding, mentoring and counselling teams through which students can obtain assistance, support and advice on their wellbeing. The College works with relevant external agencies such as Social Services and the Police as appropriate.

3.4. The College's supply chain has been identified as the area of highest risk in terms of possible occurrences of modern slavery. In order to mitigate this certain action has been taken as laid out below.

3.5. The College's procurement function is supported by a policy which contains steps that form part of the supplier selection process and lead to ensuring that slavery and human trafficking are not taking place in the supply chain.

3.6. The following procurement categories have been identified by the ONS as higher risk in terms of finding modern slavery and human trafficking occurrences in the supply chain:

- Science, Technical, and Engineering Goods and Services
- Security Services
- ICT Equipment and Services
- Estates/Facilities Goods and Services
- Construction
- Catering
- Stationary and Office Equipment
- Books and Periodicals
- Domestic Services

3.7. When procuring goods, works and services in the higher risk categories the College ensures that suppliers are required to prove a high level of corporate social responsibility and ethical processes during the tendering and selection process.

4. Our Progress and plans for the future

4.1. As part of this reporting exercise in this and the coming years, Queen Alexandra College expresses its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working within them.

4.2. We continue to monitor the supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations.

4.3. Consideration of modern slavery and human trafficking have formed part of the supplier selection process for goods, works and services in our procurement and supply categories.

4.4. Our suppliers in the higher risk areas will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) and we will be working to

persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- 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 practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

4.5. Key sources of information relating to modern slavery and human trafficking are available on QAC's intranet

4.6. This Statement has been approved and published by the College Management Team and will be reviewed annually.