

Modern Slavery Act Statement

HARROW, RICHMOND AND UXBRIDGE COLLEGES POLICY AND PROCEDURES



STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and constitutes the slavery and human trafficking statement of Harrow, Richmond and Uxbridge Colleges (“HRUC”). It will replace our previous statement, published in 2025.

This statement relates to actions and activities during the financial year 1 August 2026 to 31 July 2027.

Our Commitment

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.

HRUC has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

HRUC is committed to improving our practices to prevent slavery and human trafficking in its corporate activities, and to ensure that its supply chains are free from slavery and human trafficking. We believe transparency is crucial in tackling modern slavery and human trafficking, which is why we publish this statement and review it annually.

Organisational structure

HRUC is a statutory further education corporation established under the Further and Higher Education Act 1992. It operates three colleges campuses – Harrow College, Richmond and Uxbridge College. Its core activities include:

- Teaching and education.
- Public engagement activities.
- Procurement of goods and services to support operations.

HRUC employs approximately 1,381 members of staff and has a learner population of approximately 14,045 students. HRUC has an annual turnover approaching £120.5m of which approximately £29.5m is spent each year on goods and services to support the running of HRUC and £11.8m on capital projects.

HRUC operates both within the UK and internationally, engaging with a wide range of suppliers and partners.

Governance and accountability

We keep our governance and accountability controls under review to ensure they remain proportionate to our risk profile and aligned with relevant government guidance and good practice.

Due Diligence

As part of HRUC's initiative to identify and mitigate the risks of modern slavery occurring in any part of the college services, HRUC will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors).

These processes will be subject to on-going assessment and review. HRUC will continue to develop approaches to:

- Identify and assess the potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

HRUC identifies the following as the principal areas of potential risk:

- Supply chains and procured goods/ services.
- Outsourced activities.
- Recruitment including agency staff.
- Cleaning and catering suppliers.
- Building maintenance contracts.
- Capital construction projects.

Supply chains

When procuring any types of goods or services, HRUC requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or HRUC's own policies and procedures relating to modern slavery, will be removed from HRUC's list of suppliers and will not be considered for future supply to HRUC unless they can demonstrate that these compliance requirements are met.

HRUC reviews risk, including risks associated with particular countries and products and considers the viability of introducing other due diligence processes for monitoring and managing any additional risks identified.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the college supply chains and its business and operations, HRUC will provide training to college staff, as appropriate.

HRUC requires its business partners to provide training to their staff and suppliers and providers, where appropriate.

Reporting and whistleblowing

HRUC encourages all staff, students, and suppliers to report concerns regarding unethical practices, including modern slavery. Reports can be made through:

- Confidential whistleblowing channels
- Line management structures
- Procurement or compliance teams

All reports are treated seriously and investigated appropriately.

Recruitment practices

Temporary staff and staff recruited indirectly by HRUC are recruited through agreed, reputable recruitment agencies.

Due diligence is undertaken to ensure that only appropriate companies are selected to work with, in line with the college's standards of service.

Through its recruitment processes, HRUC ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

HRUC policies in relation to the Modern Slavery Act 2015

HRUC operates the following policies that describe its approach to the identification of modern slavery risks, and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation.
- **Staff Code of Conduct Policy**- clearly outlines the actions and behaviour expected of employees when representing HRUC. HRUC strives to maintain the highest standards of employee conduct and ethical behaviour at all times, including when operating abroad and managing its supply chain. This commitment ensures a professional, respectful, and safe environment for learners, staff, and the wider college community.
- **Equality, Diversity and Inclusion Policy**- underpins all efforts to promote fairness, dignity, and respect within the organisation and its operations. HRUC ensures all employees, regardless of their background, are treated equally and with respect. Thereby fostering an inclusive environment that actively discourages any form of exploitation. This commitment extends to safeguarding practices, ensuring that all staff and volunteers are aware of issues related to modern slavery and are trained to identify and address them effectively .
- **Recruitment Policy**- states that the HRUC only uses specified and reputable employment agencies to source labour, and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Finance Regulations/Procurement** - these regulations reflect the college's commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls
- **Anti-bribery** - HRUC is committed to the highest standards of ethical conduct and integrity in its business activities. HRUC will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.

Measuring effectiveness

HRUC will keep its approach under review and, where proportionate, use indicators to understand effectiveness, such as completion of relevant training, evidence of modern slavery considerations in procurement activity, and the number and nature of concerns raised and addressed through HRUC reporting routes.

If any person suspects modern slavery or human trafficking connected with our operations or supply chains, they are encouraged to report it promptly. HRUC will take concerns seriously, investigate appropriately, and work with relevant partners or authorities where required.

Accessibility

This statement will be made available to all staff members, stakeholders, and the general public by publication on the HRUC website.

HRUC will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

Having assessed the training needs for staff operating in different parts of the college, HRUC will look at devising and implementing training and appropriate awareness-raising methods attuned to relevant staffing groups, where appropriate.

Corporation approval

A handwritten signature in blue ink, appearing to read 'John Cope', followed by a horizontal line.

John Cope
Chair of Corporation

This statement has been approved by the Corporation in July 2026. This statement will be reviewed and updated annually.