



Slavery and Human Trafficking Statement – 2019-2020

Grŵp Llandrillo Menai believes that when acquiring goods and services, it is crucial that it is done so without causing harm to others, and is fully committed to acting ethically and with integrity in all its business dealings and relationships.

In so doing, Grŵp Llandrillo Menai supports the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights by informing our staff, students, governors and stakeholders about our policy with respect to modern slavery, human trafficking, forced and bonded labour, and labour rights violations in its supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2020.

Grŵp Llandrillo Menai is taking steps to ensure transparency in its supply chains and advocates avoidance of child labour, respecting human rights and avoiding exploitation in its commitment to sustainable and responsible procurement.

Grŵp Llandrillo Menai has identified the following categories as of being of high risk - Clothing, Food, ICT Equipment. Consequently, these are areas where it will concentrate its efforts.

Suppliers within these areas will be asked as a minimum to commit to the Base Code of the Ethical Trading Initiative (ETI). 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 practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed.

Looking to the future, Grŵp Llandrillo Menai expresses its commitment to:

- Better understand our supply chains and work towards greater transparency and responsibility towards the people working within them.
- Monitor areas that represent a risk, working with suppliers, framework organisations and franchisees, to closely monitor those supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains and take the appropriate action if necessary.
- Ensuring that all relevant staff will be offered appropriate training.
- Encourages all staff, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation through GLLM's Whistleblowing Policy. The whistleblowing procedure is designed to make it easy for staff to

make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact the Grŵp Director of Governance and Information.

The College's commitment to risk assessment and ethical procurement incorporating the principles of the 2010 Equality Act and the Modern Slavery Act 2015, in any procurement activity supports mitigation of the risks identified above.

To date we haven't been made aware of any human trafficking/slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

This statement covers our work with all partners, including franchises.

Procurement staff are currently engaged in an appropriate e-Learning training program.

For reference GLLM staff are encouraged to seek more information at UK Gangmasters and Labour Abuse Authority government web site:

www.gla.gov.uk