

EDA COLLEGE



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Modern Slavery and Human Trafficking Statement¹

Version Control/History

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¹ Made pursuant to Section 54 of the Modern Slavery Act 2015 and aligned with the Office for Students Regulatory Framework

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1. Introduction

This statement is made by EDA College (“the College”) pursuant to Section 54(1) of the Modern Slavery Act 2015. It sets out the steps the College has taken, and continues to take, during the financial year 2025–26 to ensure that modern slavery and human trafficking are not taking place in any part of its own activities or its supply chains.

EDA College has zero tolerance towards modern slavery and human trafficking in any form, including slavery, servitude, forced or compulsory labour and human trafficking as defined by the Modern Slavery Act 2015. The College is committed to acting ethically and with integrity in all of its business relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in the institution or in its supply chains.

This statement also reflects the College’s wider obligations as a higher education provider registered with the Office for Students (OfS), in particular under conditions C3 (student protection), E1 (public interest governance), E2 (management and governance) and the Prevent duty (E3), as well as its obligations under the Public Sector Equality Duty under the Equality Act 2010.

2. Definitions

For the purposes of this statement, the College adopts the definitions set out in the Modern Slavery Act 2015:

2.1 Slavery

A person is held in slavery or servitude where another person exercises powers of ownership over them, restricting their autonomy and forcing them to work.

2.2 Forced or Compulsory Labour

Work or service exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.

2.3 Human Trafficking

Arranging or facilitating the travel of another person with a view to that person being exploited, whether or not the victim has consented to the travel.

2.4 Exploitation

Includes slavery, servitude, forced labour, sexual exploitation, removal of organs, and securing services or benefits by force, threats or deception.

3. Organisational Structure and Activities

EDA College is an independent higher education provider incorporated in England and Wales. The College delivers higher education programmes to UK and international students and is registered with the Office for Students. Its principal activities include the design, delivery and assessment of academic programmes,

related student support services, and partnership arrangements with awarding bodies and external stakeholders.

The College's workforce comprises directly employed academic and professional services staff, supported by sessional and visiting lecturers and a limited number of approved contractors. All recruitment is carried out in accordance with UK employment law, including the National Minimum Wage Act 1998, the Employment Rights Act 1996, the Immigration, Asylum and Nationality Act 2006 and the Equality Act 2010.

4. Supply Chains

The College operates a relatively low-complexity supply chain that is predominantly UK-based. The principal categories of goods and services procured during the reporting period are summarised below.

Category	Examples	Modern Slavery Risk Assessment
Facilities and premises	Cleaning, catering, security, maintenance.	Recognised higher-risk sector – managed via supplier due diligence.
IT and digital	Hardware, software, telecoms, cloud services.	Lower direct risk; hardware manufacturing assessed for upstream risks.
Academic resources	Books, online libraries, academic subscriptions.	Lower direct risk; established UK and international publishers.
Professional services	Legal, audit, marketing, HR, recruitment agencies.	Generally low risk; recruitment agencies subject to specific oversight.
Stationery and consumables	Office supplies, branded merchandise, print.	Low to moderate risk depending on origin of manufactured goods.
Travel and events	Transport, accommodation, hospitality.	Low to moderate risk – recognised hospitality sector exposure.

5. Policies in Relation to Modern Slavery

The College maintains a suite of policies that, taken together, set the standards of behaviour expected of all staff, students, contractors and partners and support the prevention of modern slavery and human trafficking. These include, but are not limited to:

- This Modern Slavery and Human Trafficking Statement;
- Safer Recruitment Policy and Right to Work Procedure;
- Whistleblowing Policy, providing confidential routes to raise concerns;
- Safeguarding and Prevent Policy;
- Equality, Diversity and Inclusion Policy;
- Code of Conduct for staff and for students;
- Procurement and Supplier Management Policy;
- Anti-Bribery and Corruption Policy;
- Data Protection Policy;
- Risk Assessment Policy.

These policies are reviewed at least annually, are accessible to all staff via the College intranet, and are referenced during induction, training and performance management.

6. Due Diligence Processes

The College has implemented a range of due diligence processes to identify and mitigate the risks of modern slavery within its operations and supply chains:

- Robust right-to-work checks and verification of identity for every member of staff, in line with Home Office guidance.
- Use of reputable, regulated recruitment agencies with documented anti-slavery commitments where third-party recruitment is used.
- Modern slavery clauses included in standard contractual terms with new and renewing suppliers above defined thresholds.
- Pre-contract due diligence questionnaires for higher-risk supply categories (e.g. cleaning, security, catering, hospitality).
- Periodic review of existing suppliers, with enhanced scrutiny of those operating in higher-risk sectors or geographies.
- Routes for staff, students, suppliers and members of the public to raise concerns confidentially via the Whistleblowing Policy.

7. Risk Assessment and Management

Modern slavery and human trafficking risks are recorded and managed through the College's wider risk management framework, as set out in the Risk Assessment Policy. The Designated Governor for Risk and Compliance maintains oversight of these risks, supported by Procurement, Human Resources and the Designated Safeguarding Lead.

Risks are categorised by sector, geography and type of engagement. Higher-risk categories receive enhanced due diligence, supplier monitoring and, where appropriate, on-site assurance. The College draws on guidance from the Home Office, the Independent Anti-Slavery Commissioner and sector bodies such as Universities UK and the British Universities Finance Directors Group (BUFDG) to inform its risk assessment.

8. Effectiveness and Key Performance Indicators

The effectiveness of the College's actions to combat modern slavery is monitored using the following indicators:

Indicator	Target / Threshold	Reporting Frequency
Percentage of relevant staff completing modern slavery awareness training	≥ 95% within 3 months of joining; refreshed every 3 years	Annual
Percentage of new contracts above the procurement threshold containing modern slavery clauses	100%	Annual
Percentage of higher-risk suppliers completing due diligence questionnaires	100%	Annual
Number of modern slavery concerns raised and outcomes	All concerns triaged and acted upon within agreed timescales	Quarterly to SLT; annual to Board
Number of right-to-work checks completed correctly	100%	Continuous

9. Training and Awareness

All staff receive information about modern slavery as part of their induction, including how to identify potential indicators and how to raise concerns. Targeted training is provided to those with specific responsibilities in this area, including:

- Procurement and finance staff – supplier due diligence, contractual safeguards and red-flag indicators.
- Human Resources staff – safer recruitment, right to work, exploitation indicators in employment.
- Designated Safeguarding Lead and team – referral routes via the National Referral Mechanism (NRM) and the Modern Slavery Helpline.
- Senior leaders and Board members – governance and oversight of modern slavery risk.

10. Reporting Concerns

Anyone who suspects that modern slavery or human trafficking is taking place within EDA College or its supply chain should report it as soon as possible. Concerns may be raised:

- Internally to a line manager, the Designated Safeguarding Lead, the Designated Governor for Risk and Compliance, or via the Whistleblowing Policy;
- Externally to the Modern Slavery & Exploitation Helpline on 08000 121 700;
- To the police on 999 in an emergency, or 101 for non-emergencies;
- Through the National Referral Mechanism (NRM), where there is reason to believe a person may be a victim of modern slavery.

The College will ensure that anyone raising a concern in good faith is treated fairly and is protected from any form of detriment, in line with the Public Interest Disclosure Act 1998 and the College's Whistleblowing Policy.

11. Governance and Oversight

The Academic Board holds ultimate responsibility for this statement and for the College's approach to modern slavery and human trafficking. The Designated Governor for Risk and Compliance is responsible for day-to-day implementation and reports periodically to the Audit & Risk Committee and the Board on:

- Performance against the indicators set out in section 8;
- Material risks identified through risk assessment, audit and supplier review;
- Concerns raised and the outcome of any investigations;
- Updates to relevant policies, procedures and training.

12. Future Plans

Over the next reporting period, the College will:

- Continue to embed modern slavery considerations into procurement decisions and contract management.
- Strengthen supplier mapping, particularly in higher-risk categories such as cleaning, security and catering.

- Refresh staff training, with targeted updates for new starters and procurement-facing roles.
- Review and, where appropriate, enhance the suite of supporting policies referenced in this statement.
- Engage with sector networks and benchmarks to identify emerging good practice.

13. Approval and Signature

This statement has been approved by the Academic Board of EDA College as the College’s Modern Slavery and Human Trafficking Statement for the financial year 2025–26. It will be published on the College website and reviewed and re-issued annually.

Signed:

Name: _____

Position: Principal, on behalf of the Academic Board

Date: August 2025

End of Statement