

# Modern Slavery and Human Trafficking Statement 2025

## Introduction

The Modern Slavery Act 2015 requires large organisations undertaking business in the UK to publish an annual statement setting out the steps they have taken to prevent modern slavery in their organisation and supply chains.

This statement sets out actions to identify, prevent and mitigate modern slavery or human trafficking in our operations and supply chains during the financial year August 2024 to July 2025.

## Our Organisation

Sparsholt College Hampshire (the College) comprises Sparsholt College, Andover College, and University Centre Sparsholt, providing education and training to a diverse community of students. We employ a large number of staff and engage with a wide range of suppliers and contractors.

The College is an exempt charity for the purposes of the Charities Act 2011. The College also controls three subsidiary companies whose activities support the College's mission and objectives.

## Our Commitment

The College is committed to preventing modern slavery and human trafficking in all aspects of our operations and supply chains. We recognise our responsibility to take a robust approach to slavery and human trafficking and are fully committed to upholding the highest ethical standards in all our activities.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers, and business partners.

This statement has been discussed and approved by our Strategic Leadership Team and Board of Governors.

## Due diligence processes

As part of its initiative to identify and mitigate the risks of modern slavery occurring in any part of its services, the College has adopted due diligence processes proportionate to the severity of the risks identified and other relevant factors.

We have robust employment and health and safety practices in place to safeguard our colleagues and stakeholders.

We comply with our regulatory and legal obligations with respect to procurement of goods and services. We aim to build longstanding relationships with trusted suppliers with a reputation for excellence.

## Policies and Procedures

The College has several policies and procedures that assist in preventing slavery and human trafficking within its operations by embedding good practice and providing remedies for individuals concerned about potential instances of modern slavery with the College business. These include:

- Grievance and Whistleblowing: all employees, customers and business partners are encouraged to report any concerns relating to the direct activities or the supply chains of the College without fear of reprisal.
- Staff Code of Conduct: sets out the actions and behaviour expected of employees to always maintain high ethical and professional standards
- Financial Regulations and Counter Fraud: all business activities must be conducted with integrity and to the highest ethical standards. The College has a zero tolerance to any form of bribery or corruption by its employees or any person or body acting on its behalf.
- Procurement: The College is committed to improving its practices and to ensure due diligence procedures are applied to its current and potential suppliers.
- Recruitment & Selection: Pre-recruitment checks are conducted on all employees, as per the Department for Education's Keeping Children Safe in Education statutory requirements before appointments are made. Temporary staff recruited indirectly by the College are engaged via reputable, pre-approved agencies.
- Safeguarding: It is everybody's responsibility to ensure that the College provides a safe environment for its students and identifies any who may be in need.

## Supply Chains

The College purchases a wide range of good and services including IT services and equipment, catering services, facilities and construction, student transport buses, animal feeds, and educational resources.

All goods and services are procured in accordance with the Colleges' financial regulations and public sector procurement legislation. Where possible, the College uses approved government frameworks and Consortia.

## What we are doing now

To maintain and further reinforce our management of modern slavery risks:

- The College continues to embed due diligence in supplier selection and seeks to improve best practice in respect of procurement processes and supply chain integrity.
- Our purchase order terms and conditions have been updated and a new supplier onboarding process linked to the Modern Slavery Act 2015 introduced.
- The risk of modern slavery in our supply chains has been assessed, particularly in sectors where we perceive risks are higher (agriculture, cleaning & construction).
- All Staff Briefing – our CFO has provided guidance to our staff on recognising and reporting signs of modern slavery.
- College policies reviews take account of the Act into account where relevant.
- The College worked with a new supplier who was perceived to be potentially high risk due to the use of international labour and materials in the establishment of a new vineyard. The supplier was able to evidence membership of the Gangmasters and Labour Abuse Authority, Stronger Together and Association of Labour Providers.

## Reporting Concerns

We encourage all staff, students, suppliers, and partners to report concerns about modern slavery or human trafficking. Reports can be made confidentially and will be investigated thoroughly.

## Review and Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 July 2025. It was approved by the Board of Governors of Sparsholt College Hampshire on 11 December 2025 and will be reviewed and updated annually.