

# Lincoln College

## Anti-slavery and Human Trafficking Statement

### 1. Introduction

- 1.1 Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse or vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory behaviour, or facilitating their travel with the intention of exploiting them soon after.
- 1.2 Human trafficking involves the recruitment or movement of people, by the use of threat, force, fraud, or the abuse of vulnerability, for exploitation.
- 1.3 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Lincoln College (and all of its subsidiaries) slavery and human trafficking statement for the financial year ending 31 July 2025.
- 1.4 The Lincoln College is committed to ensuring that there is no modern slavery or human trafficking in its supply chain or in any part of its services. This statement sets out the preventative steps that the college is taking to avoid the risk of modern slavery occurring within College services.

### 2. Organisational structure

- 2.1 The Lincoln College is a further education college that employs approximately 800 staff (including its UK subsidiary companies), operating in the United Kingdom and China. Its core business is teaching a learner population of approximately 12,000 students.
- 2.2 The College's subsidiary companies and principal activities are listed below:
  - Lincoln College Corporate Support Services Ltd: the provision of support staff and administrative services
  - Deans Sport Health & Leisure Ltd: provider of fitness related services
  - FE Resources (Lincoln) Ltd: provision of temporary staff
  - Lincoln College International (LLC): a Saudi based company that delivers education and training
  - The Drill Hall Lincoln Ltd: a Performing Arts business
  - Human Alchemy Ltd: a management consultancy and training business
  - The Old Bakery: a fine dining restaurant and finishing school
- 2.3 The college spends approximately £11m on goods and services to support the running of the College.

2.4 The Lincoln College also operates in the Kingdom of Saudi Arabia via Lincoln College International LLC (LCI). LCI employs approximately 102 staff.

### 3. Due diligence processes

3.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of College services, the College 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.

3.2 The college has in place systems 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 whistle blowers

3.3 The college identified the following as the principal areas of potential risk:

- Supply chains
- Use of recruitment agencies

## 4 Supply Chains

4.1 In its supply chains, the College has identified the following business areas as carrying material risks of modern slavery occurring:

- Procurement of services

4.2 When procuring any type of goods or services, the College endeavours to ensure that any third-party suppliers operate at a high level of sustainability and environmental responsibility during any tendering and selection process, using national procurement frameworks when possible.

4.3 Any supplier that is found not to comply with the Modern Slavery Act 2015, or the College's own policies and procedures, will be removed from the College's preferred supplier list and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.

4.4 In terms of future steps, the College will continue to review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

## 5 Recruitment Practices

5.1 Temporary staff and staff recruited indirectly by the College are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential

occurrences of modern slavery, the College conducts checks on such agencies before they are approved.

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

## 6 College policies

- 6.1 The College already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of College business. The College operates the following policies which are reviewed annually:
- Staff Grievance Policy
  - Public Interest Disclosure Policy
  - Employee Code of Conduct
  - Recruitment and Selection Code of Practice
  - Procurement Strategy

## 7 Performance indicators

- 7.1 Where the College has identified risks of modern slavery occurring in any part of its services, it will aim to introduce key performance indicators (KPIs) to measure progress against reducing such risks. The College reviews KPIs in the following contexts:
- Use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery;
  - Awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action;
  - Oversight of third-party suppliers of relevant goods and services supply chains.
- 7.2 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussing of this statement during the induction process for new employees.

This statement will be reviewed annually.

Signed by: Jacqui Varlow (Chief People Officer)

Dated: September 2025