

## **Open College of the Arts**

### **Modern Slavery & Human Trafficking Statement**

This statement covers all steps taken by the Open College of the Arts to understand the risks of modern slavery and all associated actions taken in the year from 1st August 2021 to 31st July 2022, to prevent human trafficking and modern slavery.

The Open College of the Arts was founded in 1987 by Michael, Lord Young of Dartington to provide access to creative arts education to the public. OCA courses are taught at a distance utilising dispatched materials and online content, available the world over. The College operates from offices in Barnsley, UK with tutors primarily based around the UK. The Open College of the Arts is a registered charity and subsidiary of the University for the Creative Arts. The College has circa 30 office staff, 100 tutors, and 1500 students enrolled in part time distance learning courses.

This statement is made in line with the Open College of the Arts charitable status and subsequent requirements as part of the Modern Slavery Act 2015.

#### **Modern Slavery**

The College is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labour, and any other trafficking-related activity. Through our relationships with staff, tutors, students, and outsourced services we are committed to maintaining our corporate social responsibility. We intend to use employment, working, and procurement practices that mitigate against forms of modern slavery, and provide support for students who might be concerned about these issues.

Evidence suggests that around 40 million people worldwide are victims of modern slavery in one form or another. Businesses of any size and sector may inadvertently fuel exploitation through normal business functions. It is therefore incumbent upon OCA as a body in receipt of public funding to ensure that the activities we undertake identify any risks, and take appropriate action to mitigate the risks and effects in how we deliver our services.

#### **The OCA Structure**

OCA is a charity, regulated by the Charity Commission. We are overseen by our Board of Trustees who are independent appointments on the basis of their skills and experience and whose activities are regulated by the Charity Governance Code. OCA has a Senior Leadership Team who report into our Board of Trustees, four operational teams who carry out much of the running of the organisation, and an academic team broken down by degree programme of programme leaders and tutors who deliver learning to our students.

As an organisation, OCA employs staff directly and on a contracted basis to provide services for our student body. These contracts are a mix of full-time, part-time, permanent, temporary, fixed-term, and/or sessional depending upon the role and its purpose. These contracts are flexible to allow for staff to engage with academic practice across the UK Higher Education sector. We strictly prohibit forced employment practises of any kind, and the use of involuntary labour in our business. As an online distance-learning provider, OCA considers itself as low-risk, but remains committed to ensuring ongoing compliance and action with respect to human-trafficking and slavery.

## **Recruitment and Human Resources**

Our position on fair employment law is outlined in the OCA Human Resources Framework, and Tutor Handbook. As a principle, OCA is committed to robust and fair Human Resource selection and recruitment policies and processes. College policies and procedures are designed and informed by best practice in the Higher Education sector, the Equality Challenge Unit, and the Equality & Human Rights Commission. These are reviewed on an annual basis to ensure that practice remains up to date with current legislation and thinking in the sector. These are designed to mitigate the risk from human trafficking and modern slavery by imposing a clear and unequivocal position on hours of work, pay transparency, and harassment.

All staff and tutors are required and expected to comply with all tenets prescribed in the relevant framework, handbooks and college policies, including prohibition of violating the law, in particular, labour and employment law.

## **Business and Supply Chains**

OCA sources materials, content, goods, and services from a range of manufacturers and suppliers, from freelance graphic designers to catering companies, and from stationery suppliers to IT infrastructure.. OCA operates according to Financial and Procurement regulations in compliance with accounting standards..

In the 2019/20 academic year, OCA spent roughly 54% of our spend on non-staffing costs which includes administration, course development, premises and project costs. The majority of these contain costs relating to buying goods and services in one form or another.

In operational management of the College provision, certain services are outsourced to external providers namely; cleaning, IT infrastructure, certain facilities management, and academic services. It is not anticipated that the risk of modern slavery or human trafficking is high in any of the areas that OCA outsources, although it is acknowledged that cleaning represents the area of greatest risk. OCA works closely with these providers to ensure compliance with current legislation and practices that aim to eradicate human-trafficking and modern slavery. OCA's tendering and procurement process includes a requirement on

suppliers to prove a high level of corporate social responsibility aligning to the values of the Open College of the Arts.

In all outsourced services and products, we maintain our corporate social responsibility, and demand the highest ethical standards to be applied. This means requiring fair working practises, clear environmental considerations and an awareness of social impacts. It is our responsibility as an organisation and charity to encourage sustainability and inclusion amongst all we work with.

This approach applies to third-party agreements the College has, and works to encourage and promote ethical practice amongst all we work with.

## **OCA Policies**

We take a zero tolerance approach to any and all activities that fall under modern slavery including bribery, corruption, and harassment and bullying. Our approach to modern slavery centres upon the policy framework set in place to tackle these individual areas of concern. To this end we have specific policies in place to cover:

- Anti-Harassment and Bullying
- Anti-Bribery and Corruption
- Procurement
- Expenses
- Credit Card usage
- Fair Selection and Recruitment
- Working Hours

These policies set out how we deal with certain circumstances, the limitations on use, and how we ensure best practice, value for money, and ethical standards. In addition, we also have further general policies covering Whistleblowing, Safeguarding, and Wellbeing.

## **Student Support**

We encourage and support students to develop sustainable creative practices through their studies. This can involve specific requirements to engage with external companies, suppliers on certain projects as a means of developing new skills, experiencing different ways of working and seeing new perspectives. In all circumstances, OCA advises students on any work-related learning to be paid for work undertaken. For example, we are mindful of not putting students under pressure to undertake unpaid work experience or internships; this can be common in the creative arts industries. In order to help alleviate these pressures, OCA operates student bursaries to provide a safety net for any student experiencing financial difficulties who may, as a consequence, seek employment that is exploitative. In addition, during the 2021/22 academic year we will be establishing an Ethics Committee and associated policy to provide guidance and support for students navigating the world of internships and external work.

## **Training and Awareness**

We recognise that although the majority of the OCA risks on modern slavery are associated with purchasing and supply chains all staff should be aware of what modern slavery is, the risks involved, and what we as an organisation are doing to mitigate those risks. We have identified our core staff who would require such training and our intention is to begin to roll out training over the coming year. Our initial focus will be on staff who manage contracts, procurement staff and staff who deal with commercial activities due to their potential exposure and responsibilities in helping to prevent modern slavery.

We are developing a communications plan, both internally for our staff and tutors, and for our student body to enable us to begin to raise awareness of the issue, and to highlight our approach as an organisation and what we are doing to tackle the issue. Further communications are planned for 2022 to highlight some of the risks to look out for, and how to go about reporting concerns.