

Windsor Forest Colleges Group

Modern Slavery and Human Trafficking Statement

Financial Year: 1 August 2025 – 31 July 2026

Published: April 2026

Prepared in accordance with Section 54 of the Modern Slavery Act 2015

1. Introduction

The Windsor Forest Colleges Group (TWFCG) is fully committed to supporting the principles of the Modern Slavery Act 2015 and the protection of internationally recognised human rights. This statement is published in compliance with Section 54 of the Modern Slavery Act 2015, which requires organisations with a turnover of £36 million or more to produce an annual slavery and human trafficking statement.

TWFCG is a further education group comprising four colleges – Strode’s College, Windsor College, Slough & Langley College, and Berkshire College of Agriculture (BCA) – providing education and training to thousands of learners and apprentices across Berkshire and the surrounding region.

We recognise that modern slavery, in all its forms – including forced labour, human trafficking, debt bondage, and servitude – represents a severe violation of human rights. We are committed to ensuring that no form of modern slavery is present in our organisation or supply chains.

2. Our Organisation and Supply Chains

TWFCG operates across four campuses in Berkshire. Our primary activities include:

- Full-time and part-time further education for 16–18 year olds and adults
- Apprenticeship delivery across a range of industries and sectors
- Higher education programmes in partnership with universities
- Land-based, green skills, and vocational training
- Adult and community learning

Our supply chains include procurement across the following categories:

- Facilities management, construction, and maintenance contractors
- IT hardware, software, and telecommunications suppliers
- Catering and hospitality services
- Curriculum resources, learning materials, and library services
- Professional services including legal, financial, and HR consultancy
- Transport and logistics providers
- Land-based and horticultural supplies (particularly relevant to BCA)

3. Policies in Relation to Modern Slavery

TWFCG maintains a suite of policies that underpin our commitment to ethical practice and human rights. These include:

Whistleblowing Policy

Our Whistleblowing Policy encourages all staff, students, suppliers, and partners to report concerns about activities within our organisation or supply chains. Reports can be made confidentially and without fear of retaliation. The policy is reviewed annually and is accessible to all staff via the intranet.

Contractor and Supplier Code of Practice

All suppliers and contractors are required to uphold high ethical standards, including:

- Providing safe working conditions and fair remuneration
- Treating workers with dignity and respect, free from exploitation
- Complying with all applicable labour, human rights, and employment laws
- Prohibiting the use of forced, bonded, or compulsory labour
- Complying with minimum age requirements and prohibiting child labour
- Demonstrating transparency within their own supply chains

Safeguarding Policy

Our Safeguarding Policy addresses risks to vulnerable individuals, including those who may be victims of modern slavery or trafficking. Staff are trained to identify and respond to indicators of exploitation and to refer concerns to appropriate authorities.

Recruitment and Employment Policy

TWFCG conducts thorough right-to-work checks and uses reputable recruitment channels. We do not use agencies or intermediaries that charge workers fees for employment. All staff are employed on fair terms with clearly documented contracts.

4. Due Diligence Processes

TWFCG undertakes due diligence to identify and address the risk of modern slavery in our operations and supply chains. Our approach includes:

Supplier Onboarding

- New suppliers are assessed against ethical sourcing criteria prior to engagement
- Suppliers are required to confirm compliance with the Modern Slavery Act 2015 and relevant labour laws
- Contractual clauses include obligations on modern slavery compliance and the right to audit

Ongoing Supplier Monitoring

- Existing suppliers are reviewed periodically, with higher-risk categories reviewed more frequently
- Supplier self-assessment questionnaires are used to gather evidence of labour standards compliance
- Where concerns are identified, we escalate through our procurement governance process

Recruitment Practices

- All staff recruitment follows rigorous pre-employment checks, including right-to-work verification
 - Agency workers are sourced only from reputable, audited agencies
 - We do not charge workers recruitment fees at any stage
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5. Risk Assessment and Management

We have assessed the risk of modern slavery across our operations and supply chains. Higher-risk areas identified include:

- Facilities and cleaning services, where agency and migrant labour is more prevalent
- Catering and hospitality supply chains, including food production
- Land-based and agricultural supply chains, particularly for BCA
- IT hardware supply chains, which may involve manufacturing in higher-risk geographies

In response to these risks, we have:

- Prioritised enhanced due diligence for higher-risk supplier categories
- Included modern slavery risk as a standing agenda item in procurement governance meetings
- Aligned our risk assessment approach with the UK Government's statutory guidance on supply chain transparency

6. Training and Awareness

TWFCG is committed to ensuring that staff at all levels understand the risks of modern slavery and how to respond. During the 2025–26 financial year:

- All new staff receive modern slavery awareness training as part of their induction programme
 - Safeguarding and pastoral staff receive enhanced training on identifying indicators of exploitation and trafficking
 - Procurement and finance staff receive targeted training on ethical sourcing and supplier risk
 - Training materials have been reviewed and updated to reflect the latest statutory guidance
 - Awareness resources are available to all staff via the staff intranet
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7. Key Performance Indicators and Effectiveness

To measure the effectiveness of our actions, TWFCG monitors the following indicators:

- Percentage of new suppliers completing modern slavery compliance assessments at onboarding
- Number of staff completing modern slavery awareness training (target: 100% of new starters)
- Number of concerns raised via the Whistleblowing Policy relating to labour exploitation
- Number of supplier contracts reviewed for modern slavery compliance clauses
- Completion of annual review of this statement and associated policies

During 2024–25, no incidents of modern slavery were identified within our operations or supply chains. Where concerns have been raised, these have been investigated and appropriate action taken.

8. Our Commitments

TWFCG reaffirms the following commitments for the year ahead:

- Continue to strengthen due diligence in higher-risk supply chain categories
 - Expand supplier engagement on ethical sourcing expectations
 - Develop clearer KPIs to measure and report on impact year-on-year
 - Enhance reporting mechanisms to make it easier for staff and partners to raise concerns
 - Review and update this statement annually to reflect legislative changes and best practice
 - Engage with sector bodies and the Education & Training Foundation on shared approaches to modern slavery risk
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9. Approval and Sign-off

This statement has been reviewed and approved by the Board of Governors of the Windsor Forest Colleges Group and is signed on its behalf by the Principal and Chief Executive.



Signed:

Name: Gillian May Group Principal and CEO

Date: 29 April 2026

On behalf of: Windsor Forest Colleges Group Board of Governors

This statement will be reviewed and republished annually. For further information, please contact the Clerk to the Corporation at Windsor Forest Colleges Group.