

Modern Slavery and Human Trafficking Statement 2024/25

Mae'r ddogfen hon ar gael yn Gymraeg ac yn Saesneg | This document is available
in Welsh and English



Financial year ending 31 July 2025

1. Introduction

This statement is made pursuant to the section 54 of the Modern Slavery Act. It sets out the steps taken by the UWTSD Group to prevent modern slavery and human trafficking within its organisation and supply chains.

The Group is committed to acting ethically and with integrity and to meeting the expectations of the Welsh Government Code of Practice on Ethical Employment in Supply Chains.

2. Group Structure

2.1 University of Wales Trinity Saint David

The University of Wales Trinity Saint David (hereinafter referred to as “UWTSD”) is one of eight Higher Education (HE) institutions in Wales (not including the Open University in Wales) and has a total student population of approximately 25,000 (both in further and higher education).

The University was formed on 18 November 2010 through the merger of the University of Wales Lampeter and Trinity College Carmarthen, under Lampeter’s Royal Charter of 1828. On the 1 August 2013, Swansea Metropolitan University became part of UWTSD.

UWTSD is part of a Group structure which offers higher and further education and includes Coleg Sir Gâr (CSG) and Coleg Ceredigion. CSG became a subsidiary company of UWTSD in 2013, and Coleg Ceredigion became a subsidiary company of CSG in 2017. The Group offers a range of integrated pathways from year 10 upwards and has delivered transformational change for the region.

2.2 Coleg Sir Gâr

Coleg Sir Gâr is a large multi-campus further education college. It has approximately 9,000 learners of which some 2,500 are full-time, and over 6,000 part-time. The College is based in Southwest Wales and has five main campuses at Llanelli (Graig), Carmarthen (Pibwrlwyd and Jobs Well), Ammanford and Llandeilo (Gelli Aur). Campuses vary in size and nature and most offer a variety of subjects.

The College has an annual turnover of £52m and employs approximately 640 staff. Of these, approximately 313 are directly involved in teaching and 327 in support and administrative functions.

2.3 Coleg Ceredigion

Incorporated in 1993 following the amalgamation of four further education institutions across Ceredigion, Coleg Ceredigion is the largest provider of further education (FE) provision in Ceredigion with a broad curriculum base. Based on two main sites of 8,000m² with approximately 130 staff, of whom around 70 are employed on a full-time basis. The College provides education and training to the local community and has an annual turnover of £6.9m. For the academic year 2024/25 there were 900 learners at the college.

3. Our organisation and supply chains

The UWTSO Group operates across further and higher education in Wales. The majority of goods and services are procured through established public sector and higher education purchasing consortia, including:

- National Procurement Service (NPS),
- Higher Education Purchasing Consortium for Wales (HEPCW)
- Crescent Purchasing Consortium (CPC)
- Crown Commercial Services (CCS)

These consortia undertake supplier selection, due diligence and contract management on behalf of their members, including consideration of ethical employment and labour standards.

4. Policies and governance

Modern slavery is managed as part of wider procurement, safeguarding and risk management arrangements rather than through a standalone governance structure. Modern slavery risks are identified and addressed through existing institutional policies and controls, including:

- Procurement Strategy and Contract Procedure Rules
- Supplier terms and conditions
- Whistleblowing arrangements
- Safeguarding and HR policies

By ensuring that modern slavery as a concern is contained within existing policies and procedures, oversight is achieved through established governance routes.

5. Risk assessment and management

The Group adopts a proportionate, risk-based approach to modern slavery. Overall exposure is considered low to medium, reflecting the predominance of UK-based suppliers and extensive use of public sector procurement frameworks.

Risk is identified and managed through existing procurement and contract management processes, including framework selection, category awareness for higher-risk goods and services, and escalation routes where concerns arise. This approach reflects established practice across the further and higher education sector.

6. Due diligence

Due diligence is primarily undertaken at framework and contract level by purchasing consortia. This includes:

- Supplier pre-qualification and exclusion checks

- Ethical employment and labour standards requirements
- Monitoring of higher-risk categories

Where contracts are let directly, proportionate checks are applied based on risk, value and nature of supply.

The Group uses 'Net Positive' as part of its tendering and supplier onboarding process. All suppliers are awarded work through a formal tender process and are required to register with, and sign up to, the Net Positive platform. This supports the assessment of supplier practices, including ethical employment and modern slavery risk, and provides an additional layer of assurance alongside the use of public sector procurement frameworks.

7. Effectiveness and performance monitoring

The effectiveness of the Group's approach is monitored through qualitative and operational indicators rather than formal key performance indicators. These include use of approved public sector frameworks, mandatory modern slavery training for procurement staff, contract management activity and issue escalation, and the absence of reported modern slavery incidents within the Group's supply chains. Governing bodies receive assurance through existing reporting and governance mechanisms rather than separate modern slavery reporting.

8. Training

Modern slavery and ethical employment training is mandatory for procurement staff and forms part of wider legislative compliance training for staff involved in purchasing activity.

9. Ethical employment leadership

Responsibility for ethical employment and modern slavery sits within existing senior management and procurement leadership roles, reflecting a shared responsibility model aligned to current organisational structures.

10. Monitoring and continuous improvement

The Group recognises that addressing modern slavery is an ongoing process. It will continue to work with purchasing consortia and sector partners, review guidance and sector best practice, and update this statement annually to reflect progress.

11. Transparency

This statement will be published on both the University and Colleges website and submitted to the UK Modern Slavery Statement Register.