

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. PURPOSE

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 The College has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. It aims to implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in its activities or in any of its supply chains.
- 1.3 The College is also committed to ensuring there is transparency of its activities and the approach to tackling modern slavery throughout the supply chain, consistent with the disclosure obligations under the Modern Slavery Act 2015.
- 1.4 The College expects the same high standards to be applied by all of its contractors, suppliers and other business partners. Specific prohibitions are included as part of the College's contracting processes against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (whether adults or children), and the College expects that suppliers will hold their own suppliers to these standards.

2. SCOPE/TO WHOM THIS POLICY APPLIES

- 2.1 This policy applies to all persons working for the College or on its behalf in any capacity, including governors, employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2 The policy does not form part of any employee's contract of employment and the College may amend it at any time.

3. RELATED POLICIES AND PROCEDURES

- 3.1 This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following policies and procedures, which can be found in the Staffroom on Share Point.
 - Whistleblowing Policy
 - Supply Chain and Fees & Charges Policy
 - Financial Regulations
 - Safeguarding Children Policy
 - Safeguarding Vulnerable Adults Policy
- 3.2 All staff are required to familiarise themselves with the policies detailed below. Any queries about this policy should be directed to the Human Resources Department or

Programme Management.

4. RESPONSIBILITIES

- 4.1 The Board of Governors has overall responsibility for approving and monitoring this Policy. The Senior Management Team and College managers have responsibility for implementation, ensuring operational compliance with the College's legal and ethical obligations, monitoring its use and effectiveness. Compliance will be assessed periodically as part of the internal audit cycle.
- 4.2 Managers at all levels are responsible for ensuring that their staff understand and comply with this policy and receive adequate and regular training.

5. COMPLIANCE WITH THIS POLICY

- 5.1 All staff and associated persons must ensure that they read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of the College's business or supply chains is the responsibility of all staff working for the College or individuals under its control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.3 Staff must notify their manager or a member of the Human Resources Department or Programme Management as soon as possible if they believe or suspect that the policy has been breached or may occur in the future. Alternatively, they may report the matter in accordance with the College's Whistleblowing Policy.
- 5.4 Staff are encouraged to raise concerns at the earliest possible opportunity about any issue or suspicion of modern slavery in any parts of the organisation or the supply chains of any supplier tier.
- 5.5 If they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the College's supply chains constitutes any form of modern slavery, they should raise it with their line manager or Human Resources.
- 5.6 The College aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The College is committed to ensuring that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of its activities or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the Human Resources Department immediately. If the matter is not remedied, a member of staff can then raise it formally using the Grievance Procedure (which can be found in the Staffroom on Share Point or from the Human Resources department).

6. IDENTIFIED RISKS AND STEPS BEING TAKEN

The College has identified the following areas of College activities where there may be risks associated with modern day slavery and human trafficking:

- In its supply chains;
- Through use of agency or temporary staff;
- Through staff recruitment; and
- Students

6.1 Supply Chains

The College's supply chain has been identified as the area of the highest risk in terms of possible breaches to the Slavery and Human Trafficking Act and has implemented the following mitigations:

6.1.1 The College's procurement processes are supported by a due diligence questionnaire as part of its Procurement and Tendering Procedures. These enquiries form part of the supplier selection process and are designed to provide assurance that slavery and human trafficking are not taking place in the College's supply chain.

6.1.2 The following procurement categories have been identified as higher risk in terms of finding modern slavery and human trafficking occurrences in the supply chain:

- ICT Equipment and Services
- Estates/Facilities Goods and Services
- Construction
- Catering Services
- Cleaning Services

6.1.3 When procuring goods, works and services in the higher risk categories the College will ask suppliers to prove a higher level of corporate social responsibility during the tendering and selection process.

6.2 Employment of Staff Through Recruitment Agencies & Other Sources

6.2.1 The College recognises that a further high risk area of modern slavery is the use of temporary staff recruited indirectly by the College through supply or recruitment agencies.

6.2.2 When the College requires the services of temporary staff, these staff are only sourced through established and accredited companies who can provide the College with assurance that they comply with the requirements of legislation.

6.2.3 The College will check that agency staff have the right to work in the UK prior to staff being engaged.

6.3 Direct Employment of Staff

Although the College recognises that the risk level is lower in respect of staff it directly recruits, robust policies and procedures are in place in respect of Safer Recruitment in Education. The College believes that strict adherence to the College's recruitment and candidate selection policies reduces the minimal risk of the occurrence of modern slavery. In addition, the College has a whistleblowing policy through which staff can raise concerns (including anonymously).

6.3.1 Employment Practices

The College expects its suppliers to align with the following employment practices:

- Compliance with all employment laws applicable to its business
- No use of child labour which prevents children from complying with compulsory schooling or training, being harmful to their health or development
- No use of forced or compulsory labour
- Compliance with national law and regulations regarding working hours, wages, benefits and written employment conditions.
- No unlawful discrimination in its employment decisions based on: age, disability, race (including colour, nationality, ethnic group), religion or belief, sex, sexual orientation, trans gender, pregnancy or maternity, marriage or civil partnership, trade union membership or political affiliation
- Not treat its workers in an inhumane or harsh way including harassment, bullying, physical or verbal abuse or other forms of intimidation.
- Must notify its employees of the applicable supplier code of conduct.
- Identify that employees have the right to work in the UK
- Check that employees have a bank account in their own name into which remuneration is paid

6.4 Students

- 6.4.1 Although the College acknowledges that the risk of students experiencing occurrences of modern slavery or human trafficking is extremely low, the College does appreciate that whilst living within the local area students may become aware of or become entrapped in the lifestyle of a modern slave.
- 6.4.2 The College has easily accessible and well-established channels for reporting safeguarding concerns and facilities through which students can obtain assistance, support and advice on their wellbeing.

7 COMMUNICATION AND AWARENESS OF THIS POLICY

- 7.1 Training on this policy, and on the risk College faces from modern slavery in its supply chains, will be provided to staff as necessary.
- 7.2 The College's zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8 BREACHES OF THIS POLICY

- 8.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2 The College may terminate our relationship with other individuals and organisations working on its behalf if they breach this policy.