

MODERN SLAVERY POLICY

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Document History	
Area	Finance/ HR Department
Prepared by	HR Team
Approved by	
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MODERN SLAVERY

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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. We work with supplier engaging workers through a third party (such as agencies) to ensure that they are also adhering to requirements around Modern Slavery.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

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 appropriate to any risk areas identified. These processes will be subject to on-going assessment and review.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, agents, contractors and external consultants. This policy does not form part of any employee's contract of employment and we may amend it at any time.

RESPONSIBILITY FOR THE POLICY

The Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

The Finance Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the Finance Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the Finance Department.

We aim 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. We are committed to ensuring 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 our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

POLICIES RELATED TO THE MODERN SLAVERY ACT 2015

The following policies are available to all staff:

- Professional Standards
- Whistleblowing policy
- Harassment and Anti Bullying policy
- Equality and Diversity Scheme
- Safe Recruitment and Selection policy

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given to specific teams and individuals in line with requirement, Managers will work with their teams to identify anyone who may require this training and raise this requirement with the Head of HR.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.