



Anti-Slavery and Human Trafficking Policy

Approved:	October 2024
To be reviewed:	October 2025
Version	6

NAME OF 1 st REVIEWER	Michelle Smith
NAME OF 2 nd REVIEWER	Jojo Rassekh

Contents

Introduction	2
Aims	3
Responsibility for the Policy and Procedure.....	3
Role of the Head of College	3
Role of the Senior Leadership Team.....	4
Role of College Personnel	4
Raising Awareness of this Policy	4
Admission Register.....	5
Equality Impact Assessment.....	5
Monitoring the Implementation and Effectiveness of the Policy	5

Introduction

We believe this policy should be a working document that is fit for purpose, represents the college ethos, enables consistency and quality across the college.

We understand modern slavery is 'a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families. All of these factors make it very difficult for victims to escape.' (Modern Slavery Strategy (HM Government))

We acknowledge the United Nations definition of **human trafficking** as 'the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose including forced labour or sexual exploitation.'

We recognise that modern slavery is a crime and a violation of fundamental human rights. Therefore, we have a zero tolerance to modern slavery, and we expect all our suppliers to implement our high standards with their suppliers.

We have in place control systems to ensure that we do not have any association with modern slavery or human trafficking as we wish to act ethically and with integrity in all our business dealings.

We expect and will ensure everyone working with us or on our behalf supports and upholds this policy.

We wish to work closely with the Youth Participation Group (YPG) and to hear their views and opinions as we acknowledge and support Article 12 of the United Nations Convention on the Rights of the Child that learners should be encouraged to form and to express their views.

We as a college community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We all have a responsibility to ensure equality permeates into all aspects of college life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this college to feel safe, secure, valued and of equal worth.

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this college.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that relates to this policy.

Aims

- To have a zero-tolerance approach to modern slavery and human trafficking.
- To have in place effective systems and controls to prohibit the use of modern slavery and human trafficking in our operations and supply chain.
- To ensure compliance with all relevant legislation connected to this policy.
- To work with other colleges and the local authority to share good practice in order to improve this policy.

Responsibility for the Policy and Procedure Role of the Head of College

The Head of College will:

- Delegate powers and responsibilities to the Senior Leadership Team to ensure all college personnel and stakeholders are aware of and comply with this policy;
- Have responsibility for ensuring full compliance with all statutory responsibilities;
- Have responsibility for ensuring that the college complies with all equalities legislation;
- Act as the nominated designated person to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- Have responsibility for ensuring funding is in place to support this policy;
- Make effective use of relevant research and information to improve this policy;
- Have responsibility for ensuring this policy and all policies are maintained and updated regularly;
- Have responsibility for the effective implementation, monitoring and evaluation of this policy.
- Monitor its use and effectiveness;
- Deal with any enquiries about this policy;
- Audit internal control systems and procedures to ensure they are effective in countering modern slavery;
- Ensure all suppliers, contractors and business partners are aware of our zero tolerance approach to modern slavery;
- Undertake a risk-based approach to all contracting processes and will keep them under review;
- Ensure all employment and recruitment agencies supplying college personnel comply with our code of conduct;
- Take appropriate action if any individual, supplier, contractor or business partner breaches this policy.
- Ensure that everyone connected with the college is aware of this policy;
- Attend training related to this policy;
- Ensure this policy and other linked policies are up to date;
- Have responsibility for ensuring all policies are made available to parents;
- Involve the Youth Participation Group in:
 - determining this policy with the Head of College;
 - discussing improvements to this policy during the college year;

- organising surveys to gauge the thoughts of all learners;
- reviewing the effectiveness of this policy with the Head of College

The Directors and Advisors will be responsible for holding the Head of College to account.

Role of the Senior Leadership Team

The Senior Leadership will:

- Ensure we follow a zero-tolerance approach to modern slavery and human trafficking;
- Ensure we have in place effective systems and controls to prohibit the use of modern slavery and human trafficking in our operations and supply chain;
- Ensure that the procurement of goods, services and works is undertaken with economy of effort and achieves best value;
- Ensure all college personnel are aware of and comply with this policy;
- Work closely with the Head of College;
- Provide leadership and vision in respect of equality;
- Make effective use of relevant research and information to improve this policy;
- Provide guidance, support and training to all staff;
- Monitor the effectiveness of this policy;
- Annually report to the Head of College on the success and development of this policy.

Role of College Personnel

College personnel must:

- Comply with all aspects of this policy;
- Avoid any activity that might lead to or suggest a breach of this policy;
- Notify the Head of College or Senior Leadership Team if a suspected conflict with this policy has occurred or may occur;
- Raise concerns about any issue or suspicion of modern slavery in any part of this college or supply chains of any supplier;
- Be aware of the procurement strategy;
- Implement the college's equalities policy and schemes;
- Report and deal with all incidents of discrimination;
- Attend appropriate training sessions on equality;
- Report any concerns they have on any aspect of the college community.

Raising Awareness of this Policy

We will raise awareness of this policy via:

- The Employee Handbook;
- Meetings with college personnel;
- Staff training and CPD.

Admission Register

All college personnel:

- Have equal chances of training, career development and promotion
- Receive training which specifically covers:
 - All aspects of this policy
 - Equal opportunities
 - Inclusion
- Receive periodic training so that they are kept up to date with new information;
- Receive equal opportunities training on induction in order to improve their understanding of the Equality Act 2010 and its implications.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any learner and it helps to promote equality at this college.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the Head of College.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Head of College by the Senior Leadership Team for further discussion and endorsement.