



### **Anti-slavery and anti-trafficking policy**

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015. The College is committed to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with the College including all its subsidiary companies, contractors, and suppliers.

The College acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the College as a charity and higher education institution considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the College or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited. The College's standard procurement and contract documentation will address anti-slavery and anti-trafficking. Staff working in posts procuring goods and services are briefed in the importance of these provisions.
- The College encourages anyone to raise any concerns about modern slavery, using its whistleblowing policy if necessary, and will support anyone who acts in good faith.
- The College's recruitment, equalities, and remuneration and reward policies and procedures support its efforts to combat modern slavery and human trafficking.
- The College will continue to develop its commitment to combat modern slavery and human trafficking.

Any breaches of this policy may result in the College taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

Approved by the Governing Body on 19 June 2019