# Statement on Modern Slavery and Human Trafficking

Document Summary

Date of approval: 18/11/2019

Approved by: Academic Board

Last revision date: 31/08/2026

Next revision date: 31/08/2027

# Modern Slavery and Human Trafficking Policy Statement

## 1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The City College's modern slavery and human trafficking policy statement. This policy outlines our commitment to acting ethically and transparently in all our business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere in our business or in our supply chains. This statement will be made available to all students, staff, stakeholders, and the general public on our website and through our internal SharePoint.

## 2. Our Commitment and Scope

The City College has a zero-tolerance approach to modern slavery and human trafficking. This policy applies to all persons working for The City College or on its behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, and business partners. We are committed to ensuring that there is no modern slavery or human trafficking in our own operations and that we work proactively to address the risk in our supply chains.

## 3. The Nature of the Threat

Modern slavery is a crime and a violation of fundamental human rights. It involves the recruitment, harbouring, or transportation of people into a situation of exploitation through the use of violence, deception, or coercion. Victims are forced to work against their will with no way out. We recognise that this threat exists in various forms and across many industries, including those relevant to our operations as a higher education institution.

## 4. Risks in a Higher Education Context

As a higher education institution, our primary activities are teaching and learning. However, we recognise the potential for modern slavery to occur in our operational and procurement activities, particularly within our supply chains for services such as catering, cleaning, security, construction, and facilities management, and ICT hardware and digital equipment. This approach aligns with the Procurement Act 2023, which came into force in February 2025 to exclude suppliers linked to modern slavery offences and assess supplier integrity. We also recognise the potential vulnerability of students and international students to exploitation.

## 5. Due Diligence and Supply Chain Management

To mitigate the risk of modern slavery in our operations and supply chains, we will:

Conduct risk-based due diligence on all new and existing suppliers. Our approach will be proportionate to the level of risk associated with the goods and services procured.

Require our suppliers to comply with this policy and provide their own modern slavery statements where applicable. We will include specific anti-slavery clauses in new and renewed contracts.

Monitor and take necessary steps where we identify a risk of non-compliance. We will cease trading with any supplier that fails to demonstrate its commitment to and compliance with the Modern Slavery Act 2015.

Ensure that robust due diligence and recruitment procedures are used to guard against modern slavery and human trafficking in our direct employment, recruitment agencies, and third-party educational recruitment agents.

Encourage long-standing relationships with suppliers to ensure these entities have and follow suitable anti-slavery and human trafficking policies and processes.

**6. Staff Training and Awareness**

We are committed to building an anti-slavery culture within the College. We will:

Provide mandatory training to all staff involved in procurement, human resources, and student-facing roles to help them identify potential signs of exploitation and the procedure for reporting concerns.

Raise awareness among all staff and students through internal communications and guidance to help them recognise the signs of modern slavery and understand the reporting mechanisms.

**7. Reporting Suspicions**

We encourage all students, staff, and stakeholders to report any concerns related to modern slavery, either within our direct activities or our supply chains.

Our whistleblowing policy provides a confidential and secure channel for all individuals to report concerns without fear of reprisal.

All reports related to modern slavery will be treated as high priority and will be investigated promptly by the Designated Safeguarding Lead or a senior manager, in line with our Safeguarding Policy.

**8. Policy Review and Effectiveness**

The College is committed to the continuous improvement of its modern slavery policy. We will review this policy statement annually to ensure its ongoing effectiveness. We will measure the effectiveness of our policy and actions by monitoring:

The number of staff who have completed modern slavery training.

The percentage of new suppliers who have been screened for modern slavery risk.

The number of identified and reported concerns from our whistleblowing channel.

**9. Useful Links and Resources**

- Modern Slavery Helpline: Provides a confidential way to report concerns and get help.
- https://www.modernslaveryhelpline.org/
- Phone: 08000 121 700
- UK Government's Modern Slavery Act 2015 Guidance: Provides the official government position and detailed information on the law.
- https://www.gov.uk/government/collections/modern-slavery-bill-guidance
- Anti-Slavery International: The world's oldest human rights organisation, which provides valuable resources and information on modern slavery.
- https://www.antislavery.org/
- Stronger Together: An organisation that provides guidance and training to help businesses reduce modern slavery risks in their supply chains.
- https://www.stronger2gether.org/