

Policy/procedure title	Modern Slavery and Human Trafficking Policy		
Review Cycle *Please specify	3 years	Responsible Department	Human Resources
Procedure Owner *Overall responsibility	Head of Human Resources		
Responsible Person (if different to above) *responsibility for communicating changes and staff training where appropriate			
Types of provision this procedure applies to: (delete as appropriate)	N/A		

Revision Record		
Rev. No.	Date of Issue	Details and purpose of Revision:
1	21/08/2024	Initial version

Equality Impact Assessment

Whenever a policy is reviewed or changed, its impact assessment also must be updated. The Equality Act 2010 seeks to simplify discrimination law and introduced statutory duties to promote equality whereby The College of West Anglia must, in the exercise of its functions, pay due regard to the need to promote equality in relation to the protected characteristics.

Could any staff or students be adversely impacted by this policy/process? If yes give details and how this will be mitigated:	
Date	Action and Monitoring:
21/08/2024	No Actions Required

E, D & I Statement

This policy has been reviewed in line with the Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment., Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual Orientation and Disability. We will continue to monitor this procedure to ensure that it allows equal access and does not discriminate against any individual or group of people.

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1. Policy Statement

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 are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time, following consultation with unions.

2. Responsibility for the policy

The College 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 Head of HR 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 adequate and regular training on it and the issue of modern slavery in supply chains.

3. Compliance

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 chains 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 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 or suspicion of modern slavery in any parts of our business or 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 Public Interest Disclosure 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 chains constitutes any of the various forms of modern slavery, raise it with your manager.

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 of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally following our Grievance Policy and Procedure.

4. [Communication and awareness of this policy](#)

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. [Responsibilities](#)

Employee's responsibilities

Preventing and reporting suspected Modern Slavery is the responsibility of all CWA employees.

Employees are required to be aware of the signs of modern slavery and human trafficking and to be vigilant during their day-to-day job roles.

It is the employee's responsibility to complete the mandatory training as part of their induction, this includes courses on Safeguarding which has sections on modern slavery. Employees are also responsible for familiarising themselves with the CWA Safeguarding Policy, which outlines how to identify and report suspected incidents, and follow the correct procedure as/when necessary.

If you believe or suspect a breach of this policy has occurred, is occurring, or is at risk of taking place, you must report it by speaking to your line manager, the HR Department, a Safeguarding Officer or by following the procedures outlined in the Whistleblowing Policy. Any concerns should be raised as soon as possible, as long as it is safe to do so.

All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Manager's Responsibilities

If a manager has any reason to believe or an subordinate reports to them that an individual is/may be a victim of modern slavery then they must report this to either their manager, HR, a Safeguarding Officer or by following the procedure outlined in the Whistleblowing policy.

Management at all levels are responsible for ensuring their direct reports understand and adhere to this policy.

Managers are responsible for seeking out further guidance from HR should they be unsure of any aspects of this policy.

Human Resources Department Responsibilities

The Head of Human Resources has a responsibility to make sure the HR team are fully knowledgeable on this policy.

Should any modern slavery legislation be updated, it is the responsibility of the HR department to ensure that all relevant policies and procedures are amended, if necessary, to make sure they are fit for purpose in order for the corporation to remain compliant.

HR are to deal with any employee / manager queries surrounding this policy and relevant legislation accordingly.

If a member of the HR team is made aware of any slavery / human trafficking suspicions, they are responsible for informing the Designated Safeguarding Lead, or a Nominated Deputy Lead in their absence.

Appointed Safeguarding Officers Responsibilities

It is the responsibility of the Safeguarding Officers to follow the 'First Responder' procedure in line with Section 52 of the Modern Slavery Act 2015, the 'Duty to Notify'. This includes referring the case to the NRM (National Referral Mechanism) or by submitting an 'MS1' form if an adult does not give consent to be referred to the NRM.

6. Training

Modern slavery and human trafficking is included within the college's safeguarding training for children and adults. This training is mandatory for all staff.

7. Breaches of this policy

Any employee who breaches this policy may face disciplinary action, up to and including dismissal.

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

8. Review

This policy has been reviewed and approved by the Vice Principal Corporate Services 20/08/2024.

The terms of this policy will be reviewed every three years or when there are changes to legislation which affect this policy.