

Modern Slavery Policy

Position Statement / Purpose

City College Peterborough recognises its responsibilities under the Modern Slavery Act 2015 (MSA) and is fully committed to taking a robust approach in the prevention of slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Responsibilities

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

Policy

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.

The College has a zero-tolerance approach to modern slavery and human trafficking and 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. This also applies to all forms of corruption and bribery directly and indirectly associated with these criminal acts.

The College is 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. As part of our contracting processes, we will 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.

Implementation

- The College Governing Board, together with the Senior Leadership Team have overall responsibility for ensuring this policy and managers have day to day responsibility to ensure compliance with our legal and ethical obligation and therefore the implementation of the policy.
- All staff must read, understand and comply with the policy – checking first with the appropriate line manager if further explanation or clarification is needed.
- 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 are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or suppliers at the earliest possible stage.

- You must notify your senior manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future. You may also report it in accordance with our Whistleblowing Policy.
- 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. The College is 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 suppliers. 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 senior manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found in SharePoint.
- If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline on 08000 121700.
- If you are involved in procurement, you must follow procurement guidelines.
- If you are involved in sub-contracting as part of your role, you must apply due diligence when recruiting and monitoring sub-contractors.
- We expect all delivery partners, employers and other companies we engage with to ensure their goods, materials and labour-related supply chains:
 - fully comply with the Modern Slavery Act 2015
 - are transparent, accountable and auditable
 - are free from ethical ambiguities.

Failure for such parties to comply with these stipulations, will result in termination of contacts and agreements and we will report any suspicions to the police.

- Any member of staff found to be in breach of any aspects of this policy will be subject to a disciplinary investigation, the outcome of which, could result in dismissal and criminal charges.

Monitoring and Impact Assessment

This policy will be reviewed on a triennial basis or more frequently if updates are necessary to take account of changes in the law.

The policy will form part of induction for new employees and will be cascaded to all staff through MyConcern, which will track and report on outstanding returns.

Impact Assessment Approval Date: 15/ 07/ 20

SLT Approval Date: 20 / 10/ 20

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