



South
Staffordshire
College

Modern Slavery and Human Trafficking Policy

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Policy Originator:	Deputy Principal Finance & Resources
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Audience:	All Staff, Governors and Suppliers

Modern Slavery and Human Trafficking Policy

1. Policy Statement

- 1.1 South Staffordshire College ("The College") is a further education college with charitable status. The College has a duty to observe Charity Commission guidance and regulations as well as the requirements of its funding body, the Department for Education.
- 1.2 This Policy sets out the College's approach to laws and regulations around modern slavery and human trafficking.
- 1.3 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.
- 1.4 The College adopts a robust approach to modern slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in College activities and that all who 'trade' with us sharing these commitments.

2. Scope

- 2.1 This Policy applies to everyone we employ, including the Clerk to the Governors and senior post holders (as defined in the College's Articles of Government). The Policy makes it easier for us to take a consistent approach across the College. It makes clear the roles of those involved and the responsibilities of colleagues.
- 2.2 In terms of the Data Protection Act 2018 (encompassing General Data Protection Regulation (EU) (2017/679) (GDPR)), reference should be made to the College's "General Data Protection Regulation Policy" for clarification regarding how individuals' personal data is collected, managed and stored as a result of following this policy/procedure.
- 2.3 The Policy is based on the principles outlined in the Modern Slavery Act 2015.

3. Definitions

- 3.1 **Modern Slavery** - the contemporary exploitation of people in a manner likened to slavery, characterised by practices such as people trafficking, coercion of workers, and sexual exploitation.
- 3.2 **Human Trafficking** - the unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation.

4. Responsibilities

4.1 The Deputy Principal Finance & Resources is responsible for:

- Reviewing and updating the Policy on a triennial basis and annually review the Modern Slavery and Human Trafficking Policy.
- Primary and day to day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with queries about it and implementing internal control systems and procedures to ensure they are effective in countering modern slavery.

4.2 The Finance Team including Procurement are responsible for:

- Monitoring and questioning suppliers and contractors about their credentials in relation to this Policy.
- Increasing awareness and raising concerns where there are possible risks in relation to this Policy.

4.3 College management and staff:

- Managers 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 se of modern slavery in supply chains.
- Staff must ensure that they have read, understand and comply with the 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 or with the College. Staff must notify their manager as soon as possible if they believe or suspect that a breach of this policy has occurred or may occur in the future.

5. Policy Details

5.1 The College is 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.

5.2 We expect the same high standards from all our contractors, suppliers and other business partners and as part of our contracting processes and 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.

5.3 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. 3

5.4 Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in

any part of the business or supply chains at the earliest possible stage. Staff that believe or suspect a breach of this policy has occurred or that it may occur, must notify their manager or report it in accordance with the College's Whistleblowing Policy as soon as possible.

5.5 Staff unsure about whether an act, the treatment of workers more generally, or their working conditions within any part of the College supply chains constitute any of the various forms of modern slavery, must raise it with their manager who in turn must report it to the Finance Team or the Deputy Principal Finance & Resources.

5.6 The College encourages openness and will support anyone who raises genuine concerns in good faith under this policy, including if they are mistaken. The College is committed to ensure no one suffers 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 the College business or in any of our supply chains.

5.7 The College will provide training for all staff on Modern Slavery & Human Trafficking on a three year rolling basis

6. Monitoring

6.1 This Policy will be reviewed triennially by the Finance & Resources Group and the Corporation. The Modern Slavery & Human Trafficking statement will be reviewed, updated and signed annually.