



**DOCUMENT DETAILS**

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Applicability	All staff, volunteers, partners, stakeholders and Governors of Nottingham College.
Summary	The purpose of this document is to set out our slavery and human trafficking policy and statement.

**DOCUMENT CONTROL**

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<b>Version history</b>			
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**DOCUMENT APPROVAL**

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<b>Approving person/body</b>	<b>Job Role (where applicable)</b>	<b>Date Approved</b>

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# Modern Slavery and Human Trafficking Policy

## 1. Introduction

This statement sets out Nottingham College's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains.

Nottingham College recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Nottingham College is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## 2. Organisational Structure and Supply Chains

This statement covers the activities of Nottingham College and its subsidiary companies EMTEC Limited and NCN Services Limited. Nottingham College has a diverse supply chain covering staffing resources and operational activities including but not limited to, estates management, cleaning and transport.

Nottingham College is aware of its legal responsibility, and ensures that its supply chain complies with the Act. This includes policies, risk assessment, due diligence and training requirements.

Nottingham College is a Further Education Corporation created by statute and is an exempt charity. Nottingham College is responsible to the Education & Skills Funding Agency (ESFA) as principal regulator for Further Education Institutions in England that are exempt charities.

The Nottingham College Board oversees the strategic development of Nottingham College and ensures the effective use of resources and the general solvency of the institution.

The College employ around 1,400 staff, subject to variance throughout the course of an academic year.

## 3. Relevant Policies

Nottingham College has a number of policies that assist in preventing slavery and human trafficking in its operations, including:

## 4. Whistleblowing Policy

Nottingham College encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

## **5. Safeguarding Policy**

Nottingham College provides advice and guidance to staff that includes references to modern slavery and trafficking in the form of published guidance and formal staff training. The legislation, and its implications for practitioners and students, is clarified in the College's Safeguarding Policy and is covered in the associated Safeguarding Guidance documentation. In addition, it is fully covered in face to face staff training packages during staff induction and in advanced training offered to key staff.

## **6. Procurement Policy**

Nottingham College is committed to ensuring that its suppliers adhere to the highest standards of ethics, and has reviewed its Terms & Conditions to ensure that existing suppliers are aware of their obligations under the Act and comply where necessary. All new suppliers are vetted for compliance with the regulations as part of the due diligence process. Training is delivered for key staff and budget holders.

Any supplier, or potential supplier, that does not comply with the Modern Slavery Act, or the College's own policies and procedures, will be removed from the College's list of suppliers. They will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.

## **7. Recruitment & Selection Policy**

Nottingham College uses reputable employment agencies to source staffing requirements. It verifies the practices of any new agency used before accepting workers from that agency.

The College ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

## **8. Financial Regulations (including Fraud Policy and Anti-Bribery Policy)**

Nottingham College is committed to the highest standards of ethical conduct and integrity in its business activities. The College will not tolerate any form of bribery or corruption by its employees or any person or body operating on its behalf.

## **9. Due Diligence**

Nottingham College undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

The New Supplier Application Form requires suppliers to provide evidence that they comply with the Act, and thereby the College seeks assurance that an analysis has taken place of the current suppliers who meet the turnover criteria, and that the College has received assurances that these organisations comply with the Act.

Tender documents include a supplier Suitability Assessment Questionnaire to seek assurance that potential future suppliers comply with the Act before entering into new contracts.

### **10. Performance Indicators**

Where the College identifies risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The College will consider setting and reviewing KPIs in the following contexts:

- Use of Grievance and Whistleblowing Policies by staff to raise concerns about instances of modern slavery
- Training and awareness-raising amongst staff including risk management, appropriate decision-making and timely remedial action.

Failure to comply with this policy may lead to the cessation of contracts and or dismissal as appropriate.

The statement will be made available to all staff members, stakeholders, contractors and the general public by publication on the College's website.

### **11. Training**

Nottingham College ensures that key staff undertake training on modern slavery, where deemed necessary, and engages with external training providers, as appropriate.