

Modern Slavery and Human Trafficking Policy

Owner: Executive Director of Finance	Linked Strategies: Financial sustainability
Relevant to: Finance Department, all staff involved in procurement of goods and services	

Office Use only:

Corporate Intranet Family:	Approval Board/Committee/Group:	Approval/Re-approval Date:	Implementation Date:	Next Review Date:
	Finance and General Purposes Committee Executive Owner: Executive Director - Finance	GB 14 December 2022	V 1 - November 2021 This version December 2022	November 2024

Date: 23 November 2022	Doc Name: Modern Slavery and Human Trafficking Policy	Ref: v1.2
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New Policy or Substantive Policy Review

Version	Date	Policy Development Agreed by (Executive Owner)	Policy Development Author	Draft Policy Verified by	Policy Approval	Impact Assessment (if applicable)
1	November 2021	Executive Director - Finance	Executive Director - Finance	Executive Director - Finance	Executive	N/A

Rationale for new or substantive policy review	Legislative requirements for actions to be taken within this area.
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Please make explicit if change/review relates to procedures, guidelines and associated documents only

Periodic Policy Review / Change History

Version	Date of Review / Revision	Description of Change	Reviewed By	Approved By (Executive Owner)
1.2	November 2022	Addition of supporting document "Supplier Code of Conduct" and updating of links	Head of Finance	Executive Director Finance

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1. POLICY STATEMENT

This policy is intended to cover the college approach through the procurement process to Modern Slavery and Human Trafficking within the supply chain. This supplemental policy links to the [Financial Regulations](#) for the college. It is a requirement under the UK Modern Slavery Act for all organisations operating above a certain threshold of turnover (£36m) to have in place arrangements for ensuring that supply chains are free from slavery and human trafficking and the organisation itself does not carry out such activities. Regardless of this it is also good, ethical practice.

2. DEFINITIONS

These are taken from the Modern Slavery Act 2015:

Slavery/servitude: a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude.

Forced or compulsory labour: a person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Human Trafficking: where a person arranges or facilitates the travel of another person with a view to that other person being exploited, with or without their consent.

Exploitation: This can be in addition to the above areas, sexual exploitation (e.g. forced into prostitution), removal of organs, securing services by force, threats or deception, securing services from children and vulnerable persons (including an individual being forced into committing criminal acts against their will as a possible debt-bondage process).

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3. PRINCIPLES

The Sheffield College's core values are at the heart of everything we do. We are committed to running our business ethically and to EU and UK best purchasing practice, complying with the relevant statutory requirements and guidelines and in accordance with the high standards embedded in our core values: Integrity; Inclusiveness; Involvement: Inspiration and Innovation. We are also committed to leading in diversity and inclusion aligning to the values of Fairness, Respect, Equality, Diversity, Inclusion and Engagement which underpin our approach to Modern Slavery and Human trafficking. In addition to these, specific principles applied are:

- there is a commitment that Modern Slavery and Human Trafficking have no place within the supply chain for the college or the subsidiary companies
- there is a commitment that all our students are safe, as articulated within our safeguarding policies and procedures
- there is a commitment to continually review the supply chain with a view to identifying any risks of Modern Slavery in relation to the college and put in place procedures and actions to ensure there is no slavery or human trafficking within our supply chains.

The combination of these principles is weighted towards minimising risk of non-compliance with the act, positively promoting anti-slavery and anti-human trafficking both within the college and with our stakeholders.

4. SCOPE AND LIMITATIONS

This policy is focussed on the procurement activities within its supply chain for goods and services procured.

5. RESPONSIBILITIES

The Chief Executive and Principal and the Governors are responsible for the overall compliance of the college with the Act.

The Executive Director Finance is responsible for the procurement operations. They will liaise with the Chief Executive and Principal and Governors where there are any issues in relation to compliance with the act.

The Executive Director Finance will review the approach and actions taken in relation to this policy and draft the commitment statement for review by Governing Body.

All staff within college who are able to raise requisitions and authorise them have a responsibility to ensure that they are complying with the act.

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6. IMPLEMENTATION ARRANGEMENTS

All new relevant members of college staff are made aware of the policy and requirements during the formal staff induction process. Updated and amended procedures are disseminated in accordance with the policy review dates.

An annual commitment statement of work undertaken to meet the requirements of the act is required to be published annually.

A risk assessment is undertaken to identify the key areas where mitigating actions are required to provide a focus for this work to be undertaken.

Ensuring awareness and compliance in the supply chain requires specific due diligence arrangements to be undertaken and put in place. This is then supplemented by scrutiny activities with suppliers and training and support to enable the supply chain to meet the college requirements.

Training and updating of information is carried out with college staff to increase awareness of the requirements.

7. MONITORING & REVIEW

This policy will be reviewed biannually by Finance, Employment and General Purposes Committee which will approve minor updating and recommend any substantial changes in policy to Governing Body for approval.

8. SUPPORTING/RELATED DOCUMENTS

The [Financial Regulations](#) provides guidance in relation to procurement activity.

The [Whistle Blowing](#) policy provides guidance on what to do if there are concerns that an act of prohibited conduct is being carried out in the college.

The Safeguarding Policy, Procedures and guidelines provide information in relation to the safety and well-being of our students.

The recruitment and selection policy and staff code of conduct also provide the framework to ensure that staff are not exploited or exposed to prohibitive conduct.

The Supplier Code of Conduct provides more information on the expectations of suppliers in meeting the College Procurement requirements and duties in relation to the Modern Slavery Act.

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