

DOCUMENT DETAILS

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| Document Name: | Modern Slavery and Human Trafficking Statement | | | |
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| Document author | Senior People Services Business Partner | | | |
| Document owner | Director of People & Culture | | | |
| Applicability | Students | | Staff | X |
| | Governors | X | Other | X |
| Summary | The purpose of this document is to set out our statement on modern slavery and human trafficking. | | | |

DOCUMENT CONSULTATION & APPROVAL

| Consultation person / body | Date passed |
|----------------------------|-------------|
| Finance & Assets Committee | Nov 25 |

| Approval body | Date approved |
|---------------|---------------|
| Board | Dec 25 |
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IMPACT ASSESSMENT

A significant negative impact has been identified in the following area and a full impact assessment / risk assessment is available.

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|----------------------|----|
| Equality & diversity | No |
| GDPR | No |
| Health & safety | No |
| Safeguarding | No |

| | |
|--------------------------------------|-----|
| Friendly version of policy available | Yes |
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POLICY CHANGES

| Key updates | Impact | Section reference |
|--|--|-------------------|
| Added in Safecall as a way of colleagues reporting concerns | A further way the college can measure any concerns | 7 |
| Updates to procurement policy, finance regulations and due diligence to reflect current practice | | 5 and 6 |
| Terminology changes e.g. ESFA replaced by DfE | | |

1. STATEMENT & PURPOSE

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.

2. STRUCTURE OF NOTTINGHAM COLLEGE

This statement covers the activities of Nottingham College and its subsidiary companies EMTEC Limited and Nottingham College 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 a further education corporation created by statute and is an exempt charity. Nottingham College is responsible to the Department for Education (DfE) 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 employs around 1,700 staff, subject to variance throughout the course of an academic year.

3. KEY RESPONSIBILITIES

People Services

- Review this statement ensure compliance with employment legislation.
- Maintain policies in a format that are readily available and easily accessible to colleagues.

4. GENERAL PRINCIPLES

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. This includes policies, risk assessment, due diligence and training requirements.

5. RELEVANT POLICIES

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

[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.

[Safeguarding Policy](#)

Nottingham College provides advice and guidance to colleagues 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.

Procurement Policy

Nottingham College is committed to upholding the highest standards of ethical procurement, in line with the CIPS code of conduct. This includes a zero-tolerance approach to modern slavery and human trafficking. The college carries out due diligence on both new and existing suppliers to ensure compliance with the Modern Slavery Act and other relevant legislation. Key staff and budget holders receive training to support ethical decision-making and maintain vigilance across procurement activities.

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.

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.

Financial Regulations (including Anti-Fraud Policy and Anti-Bribery)

Nottingham College is committed to the highest standards of ethical conduct and integrity, with zero tolerance for modern slavery, human trafficking, bribery, corruption, and financial crime. In line with its financial regulations, the college expects all colleagues, suppliers, and third parties to uphold these standards. Concerns about unethical or unlawful behaviour can be reported confidentially under the college's whistleblowing process, and all reports will be investigated appropriately with protections in place for whistleblowers.

Code of Conduct

Nottingham College makes clear to colleagues the actions and behaviour expected of them when representing our organisation. It strives to maintain the highest standards of colleague conduct and ethical behaviour.

6. 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 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 procurement specific questionnaire to seek assurance that potential future suppliers comply with the Act before entering into new contracts.

7. 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 colleagues to raise concerns about instances of modern slavery
- Incidents logged through Safecall (the college's external anonymous reporting line)
- Training and awareness-raising amongst staff including risk management, appropriate decision-making and timely remedial action.

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

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

8. TRAINING

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