1. **INTRODUCTION**

1.1 This statement sets out Coventry College’s (“the College”) actions to understand potential modern slavery and human trafficking 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 own business and its supply chains.

1.2 The College is committed to ethical trading principles and we set out the steps we are taking to identify risks and tackle modern slavery and human trafficking in our business and supply chains. The College aims to ensure transparency is achieved within the organisation so the objectives of the Act are achieved on a consistent basis.

2. **THE ORGANISATION**

2.1 The College offers exciting opportunities for our learners, staff and stakeholders access high-quality teaching and learning at our campus based at 50 Swanswell Street, Coventry.

3. **POLICY ON SLAVERY AND HUMAN TRAFFICKING**

3.1 The College is committed to acquiring goods and services for its use without causing harm to others. The College make reasonable endeavours to ensure all employees and agents within the College supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid in line with the national minimum wage.

3.2 All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Senior Leadership Team taking responsibility lead for overall compliance.
3.3 The following Policies and Procedures support the organisation’s compliance with the Act:

- Equality Strategy
- Grievance Policy
- Whistleblowing Policy
- Anti-bribery policy
- Contract Management and Due Diligence processes
- Procurement Processes and Policy

4. RECRUITMENT PRACTICES AND POLICY

4.1 Where temporary staff are recruited indirectly by the College this is done so through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery the College conducts checks on such agencies before they are approved.

4.2 Through its recruitment processes the College ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

5. SUPPLY CHAINS

5.1 The College has a zero-tolerance approach to slavery and human trafficking and will ensure, as far as we are able, our supply chain and contractors comply with the College’s values and behaviours.

5.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of the College we adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

5.2 For example, when tendering for goods or services the College requires all potential third party suppliers to confirm that they are compliant with their statutory obligations related to equality and antidiscrimination. This required declaration includes, but is not limited to, compliance with the Act.

5.3 Any supplier or potential supplier identified as not complying with the Act, or the College’s own policies and procedures, will be removed from the College’s list of suppliers and will not be considered for future supply to the College unless they can demonstrate that these compliance requirements are met.

5.4 This statement will be made available to all staff members, stakeholders and the general public by publication on our website. The College will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

5.5 There have been no reported incidents of modern slavery or human trafficking during the financial year August 2022 to August 2023. If any concerns were to be raised, a full investigation would be carried out and appropriate action taken.

5.6 This statement has been approved by the College’s Senior Leadership Team. This statement relates to the College’s financial year August 2022 to July 2023.
6. REVIEW OF POLICY

6.1 The above policy will be reviewed by the relevant parties every financial year.

7. ENVIRONMENTAL IMPACT ASSESSMENT

7.1 The College is fully committed to the sustainability agenda.

7.2 All policies take into consideration at the time of writing and approval with the Senior Leadership Team their impact.

7.3 Policies may not be approved or be amended if they impact significantly on our commitment to improving our carbon footprint and our corporate social responsibility.

8. GENERAL DATA PROTECTION REGULATION (GDPR)

8.1 All policies which are approved by the Senior Leadership Team are in line with our GDPR suite of policies and procedure.

Signed: [Signature]

Date: 7 May 2024

Position: Principal/CEO/Governor