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Related policies/procedures/guidance/forms	Annual Slavery Statement Safeguarding Policy Whistleblowing Policy Procurement Policy Staff Recruitment and Selection Policy Equality, Diversity and Inclusion Policy Staff Code of Conduct Student Code of Conduct Risk Management Policy Supplier Code of Conduct
Staff member responsible for update	Katie Jack

Amendment History

Version	Revision Summary	Date Approved	Author

Modern Slavery and Human Trafficking Policy

1. Policy Statement

1.1 Christ the Redeemer College London (CRC) is committed to conducting all its activities ethically, responsibly and with integrity. The College adopts a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, servitude, bonded labour and exploitation.

1.2 The College recognises its responsibility to protect human rights and to ensure that modern slavery does not occur within its operations, workforce, supply chains, partnerships or any activities associated with the delivery of education and student services.

1.3 The College is committed to complying with the Modern Slavery Act 2015 and all other applicable legislation and guidance relating to the prevention of slavery, human trafficking and labour exploitation.

2. Purpose

2.1 The purpose of this policy is to:

- Prevent modern slavery and human trafficking within the College and its supply chains.
- Promote awareness of modern slavery risks.
- Establish clear reporting and investigation procedures.
- Protect individuals who may be vulnerable to exploitation.
- Ensure appropriate due diligence in procurement and supplier management.
- Support victims and potential victims of modern slavery.
- Demonstrate the College's commitment to ethical business practices and human rights.

2.2 The policy should be read in conjunction with the following related policies:

- Safeguarding Policy

- Whistleblowing Policy
- Procurement Policy
- Staff Recruitment and Selection Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Student Code of Conduct
- Risk Management Policy
- Supplier Code of Conduct

3. Scope

3.1 This policy applies to:

- Permanent and temporary employees.
- Agency workers.
- Casual workers.
- Contractors and consultants.
- Volunteers.
- Governors and trustees.
- Students.
- Placement providers.
- Suppliers and service providers.
- Third-party organisations engaged by the College.

3.2 The policy applies to all College activities within the United Kingdom and any international activities undertaken by or on behalf of the College.

4. Definitions

4.1 For the purposes of this policy:

Modern Slavery

4.2 Modern slavery is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking.

Human Trafficking

4.3 Human trafficking involves the recruitment, transportation, transfer, harbouring or receipt of individuals through coercion, deception, abuse of power or exploitation.

Forced Labour

4.4 Work or service exacted from a person under threat, coercion or penalty where the individual has not offered themselves voluntarily.

Labour Exploitation

4.5 Situations where workers are subjected to unfair treatment, excessive working hours, withheld wages, intimidation or unsafe working conditions.

These definitions are consistent with the Modern Slavery Act 2015 and UK Government guidance

5. Legal and Regulatory Framework

5.1 This policy is informed by:

- Modern Slavery Act 2015
- Human Rights Act 1998
- Equality Act 2010
- Employment Rights Act 1996
- Safeguarding Vulnerable Groups Act 2006
- Immigration, Asylum and Nationality Act 2006
- Public Interest Disclosure Act 1998
- UK Government Transparency in Supply Chains Guidance
- Office for Students Regulatory Framework
- UK Government Guidance on Tackling Modern Slavery in Supply Chains

5.2 The College will maintain compliance with all applicable legal requirements and sector expectations.

Continuous Improvement

6.5 The is committed to the following:

Ethical Employment Practices

6.2 The College will ensure that the following practices are undertaken:

- Verify employees' right to work in the UK.
- Conduct fair and lawful recruitment processes.
- Ensure workers are employed voluntarily.
- Pay at least the statutory minimum wage.
- Prohibit recruitment fees charged to workers.
- Ensure contracts are transparent and understood.

Protection of Students

6.3 The College recognises that some students may be vulnerable to exploitation. The College will therefore:

- Maintain safeguarding procedures.
- Train relevant staff to recognise indicators of exploitation.
- Provide clear reporting mechanisms.
- Refer concerns to appropriate authorities where necessary.

Ethical Procurement

6.4 The College will seek to ensure that suppliers:

- Operate lawfully and ethically.
- Comply with modern slavery legislation.
- Undertake due diligence within their own supply chains.
- Cooperate with College audits and investigations.

Continuous Improvement

6.5 The College will continually review and strengthen measures designed to prevent modern slavery and exploitation

6. Roles and Responsibilities

Board of Governors

7.1 The Board is responsible for:

- Providing strategic oversight.
- Reviewing annual reports relating to modern slavery risks.
- Ensuring adequate resources are available for implementation.

Rector

7.1 The Rector has overall accountability for implementation of this policy.

Head of Compliance and Quality

7.2 The Head of Compliance and Quality shall:

- Monitor compliance with this policy.
- Maintain risk assessments.
- Coordinate investigations where required.
- Provide annual reports to senior management and governors.

Human Resources

7.3 Human Resources shall:

- Ensure robust recruitment practices.
- Verify right-to-work documentation.
- Investigate concerns relating to workforce exploitation.

Procurement and Finance Staff

7.4 Responsible for:

- Conducting supplier due diligence.
- Including anti-slavery clauses in contracts.

- Monitoring supplier compliance.

Staff

7.5 All staff must:

- Remain vigilant to signs of exploitation.
- Report concerns immediately.
- Participate in mandatory training

Students

7.5 All students must:

- Remain vigilant to signs of exploitation.
- Report concerns immediately.

8. Identifying Modern Slavery Risks

8.1 Indicators may include:

- Individuals appearing fearful, anxious or controlled.
- Lack of personal identification documents.
- Restricted freedom of movement.
- Signs of physical abuse or neglect.
- Workers living in overcrowded accommodation.
- Excessive working hours.
- Unusual wage arrangements.
- Third parties controlling communications or finances.

8.2 The presence of one indicator does not automatically indicate modern slavery; however, concerns must be reported and investigated appropriately

9. Reporting Concerns

9.1 Anyone who suspects modern slavery or human trafficking must report concerns immediately to:

- Line Manager;
- Head of Compliance and Quality;
- Designated Safeguarding Lead; or
- Through the College Whistleblowing Procedure.

9.2 Reports may be made confidentially.

9.3 No staff or student will suffer detriment for raising concerns in good faith.

10. Responding to Concerns

10.1 Where concerns arise, the College will:

- Assess immediate safeguarding risks.
- Protect affected individuals.
- Preserve relevant evidence.
- Seek specialist advice where necessary.
- Refer matters to statutory authorities, including the police or safeguarding agencies where appropriate.
- Cooperate fully with investigations.

10.2 The welfare and safety of potential victims shall remain the primary consideration.

11. Supplier Due Diligence

11.1 The College will adopt a risk-based approach to supplier management. This may include:

- Supplier questionnaires.
- Modern slavery declarations.
- Contractual compliance clauses.
- Risk assessments for higher-risk sectors.
- Periodic supplier reviews.
- Investigation of allegations involving suppliers.

Higher-risk sectors may include:

- Cleaning services
- Security services
- Catering
- Construction
- Facilities management
- Temporary labour providers
- Overseas manufacturing and sourcing

11.2 Supply chain due diligence is recognised as an important element of effective modern slavery prevention.

12. Training and Awareness

12.1 The College will provide appropriate training for:

All Staff

12.2 Training for all staff will cover:

- Understanding modern slavery.

- Recognising warning signs.
- Reporting procedures.

Managers

12.3 Managers will receive additional training on:

- Workforce monitoring.
- Recruitment risks.
- Managing allegations.

Procurement Staff

12.4 Staff involved in procurement will receive additional training on:

- Supply chain risks.
- Supplier due diligence.
- Contract management.

12.5 Training records shall be maintained.

13. Monitoring and Review

13.1 The College will monitor:

- Reported incidents.
- Risk assessments.
- Staff training completion rates.
- Procurement compliance.
- Supplier due diligence outcomes.

13.2 An annual review shall be undertaken by the Head of Compliance and Quality.

14. Monitoring and Review

14.1 Where required by law or deemed appropriate by the Board of Governors, the College will publish an annual Modern Slavery Statement outlining:

- Governance arrangements.
- Policies and procedures.
- Supply chain management.
- Risk assessments.
- Due diligence activities.
- Staff training.
- Future actions.

14.2 The statement shall be approved by the Board and published on the College website in accordance with current government guidance.

15. Non-Compliance

15.1 Failure to comply with this policy may result in:

- Disciplinary action.
- Termination of contracts.
- Removal from approved supplier lists.
- Referral to law enforcement authorities.

16. Equality Impact

16.1 This policy supports the College's commitment to equality, diversity, inclusion and human rights by helping protect vulnerable individuals from exploitation and abuse.

17. Policy Review

17.1 This policy will be reviewed annually or following any significant changes in legislation or guidance from the OfS.