

Modern Slavery Policy

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Policy owner	Stephen Belling
Policy author	Stephen Belling
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1. **POLICY STATEMENT**

Modern slavery is a crime and a violation of fundamental human rights. Birmingham Metropolitan College (BMet) is committed to ensuring that acts of modern day slavery and human trafficking have no place in its business and supply chain. The purpose of this policy and supporting documentation and procedures is to prohibit modern slavery in all its forms in the delivery of BMet products and services. Modern slavery can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty or freedom of movement by another in order to exploit them for personal or commercial gain.

2. **SCOPE**

This policy applies to:

- BMet's Governors.
- Salaried employees, hourly paid associates and third party workers.
- All examiners, third party representatives and other contractors, service providers and partners working with BMet.
- Registered Exam Centres.
- Delegates
- Other suppliers.

The contents of this policy are not contractual. An employee should refer to their BMet Terms and Conditions of Employment for contractual information. However, it is the responsibility of every employee to familiarise themselves with, and to comply with, this policy. Employees should ensure that they are referring to the current version. BMet reserves the right to amend this policy

3. **PROCEDURE/COMPLIANCE OBLIGATIONS**

BMet commits that it will:

- Be clear about our recruitment procedure and only use agreed, reputable recruitment agencies.
- Bear the cost of recruitment agencies rather than pass them to the job applicant.
- Lead by example by making appropriate checks on employees and suppliers at point of application to ensure we know who is working for us.
- Ensure we have in place an open and transparent grievance process for all staff.
- Ensure that our employees' rights around the world are compliant with local laws and upheld.
- Check our supply chains for signs of modern slavery.
- Consider the risk of modern slavery in our procurement practices and engage with employers to ensure declaration of conformity.

- Train our staff, examiners and representatives to spot and respond to signs of modern slavery.
- Make a clear statement that we take our responsibilities concerning modern slavery seriously.

The prevention, detection and reporting of modern slavery in any part of BMet's business or supply chains is the responsibility of all those working for BMet or under the organisations control. Individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Individuals must notify their manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of BMet's business or supply chain or of any supplier tier at the earliest possible stage. If they think someone is in immediate danger, they should contact the police.

4. IDENTIFYING SLAVERY

There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support. We recognise that there may be some people more vulnerable to becoming a victim of slavery for example, people with a disability. However, the following key signs could indicate that someone may be a victim of slavery or trafficking:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being controlled by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive. A person may display a number of the trafficking Indicators set out above, but they are not necessarily a victim of slavery or trafficking. However, if you have a suspicion, report it.

5. SUPPLY CHAINS

In its supply chains, the college has identified the following high-risk business areas as carrying material risks of modern slavery occurring this is not an exhaustive list and the risk applies to all areas of the supply chain):

- IT equipment.
- Clothing and uniforms.
- Outsourced cleaning.

- Capital construction projects.
- Outsourced security services.
- Outsourced Catering and Hospitality.
- Sub Contracted Delivery.

When tendering any types of goods or services, the college requires any potential third-party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection processes, including through contracting with suppliers from approved procurement frameworks.

When procuring any types of goods or services the college requires any supplier to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.

Any supplier or potential supplier, identified as wishing to supply to or partner with the college that does not comply with the Modern Slavery Act 2015, 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.

6. COLLEGE POLICIES

The college already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of college business. The college operates the following policies and procedures:

Whistleblowing.

Staff Grievance.

Child Protection & Safeguarding

.Anti-Bribery .

Anti-Fraud.

Financial Regulations

..Staff Recruitment.

Staff Disciplinary Procedure.

Engagement of Hourly Paid Associates and Third Party Workers Policy.