

# Statement on Modern Slavery

## **Document Summary**

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## Modern Slavery and Human Trafficking

### 1: Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the College's modern slavery and human trafficking statement. This statement will be made available to all students, staff members, stakeholders and the general public by publication on our website, and to students, staff members through publication on Sharepoint.

### 2: About Us

Inter-Ed UK Limited (t/a The City College) is a company registered in England and Wales under company number 05037242 and whose registered office is at University House, 55 East Road, London N1 6AH. The principal activity of The City College is Higher Education.

### 3: The nature of the threat

Modern slavery and human trafficking involves the recruitment, harbouring or transportation of people into a situation of exploitation through the use of violence, deception or coercion. The victims are forced to work against their will with no way out. It involves the deprivation of a person's liberty by another in order to exploit that person for personal or commercial gain.

Modern slavery is a crime and a violation of fundamental human rights. Many victims work in the construction industry, in agriculture, in the sex industry, in domestic servitude, including forced marriage and in places like nail bars, car washes, and cannabis farms. Children are found working in all of these situations, as well as in sexual slavery.

Many victims have been trafficked from overseas – frequently from eastern Europe, south east Asia, and Africa – and their exploitation often begins en-route. British victims tend to have fallen on difficult times, making them vulnerable to the lure of well-paid work complete with decent accommodation, which proves to be a cruel lie.

### 2: Our Commitment

This statement is our public commitment to acting ethically and transparently in all our business and other relationships, and that no modern slavery or human trafficking will knowingly be permitted, supported or endorsed through our business or supply chains at any time. We have zero tolerance towards modern slavery and human trafficking and fully support the Modern Slavery Act 2015 and its intention to tackle all forms of modern slavery.

## **Modern Slavery and Human Trafficking**

### **3: Scope**

This policy applies to all persons working for the College or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **4: Our business and supply chain**

The College currently operates exclusively in the London area, but we acknowledge and recognise the potential for modern slavery to occur regardless of location. We will:

- work with our suppliers to ensure that our approach to modern slavery and human trafficking is reflected in all our purchases of goods and services so that neither we nor they are involved in any way, either directly or indirectly, in slavery and human trafficking
- seek, wherever practicable, to include in any contracts with our business partners' specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we will expect that those suppliers will operate to the same high standards
- ensure that robust HR recruitment policies and procedures will be used when employing staff directly to guard against modern slavery and human trafficking, and that any agencies used for the recruitment of temporary staff are able to demonstrate similarly effective measures
- provide a whistleblowing policy to encourage all students, staff and stakeholders, and other business partners to report any concerns related to the college's direct activities or the supply chains
- issue guidance when required to provide clarity for employees regarding the actions and behaviour expected of them when representing the organisation and managing its supply chain
- cease trading with any supplier or potential supplier identified as not complying with the Modern Slavery Act 2015 unless they can demonstrate their compliance satisfactory to given requirements
- monitor and take any necessary steps where we feel that there is a risk of any lack of effectiveness of our policy.