



Anti-Slavery & Human Trafficking Policy

Polisi Atal Caethwasiaeth a Masnachu Pobl

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If you or someone you know would like this document in Welsh or an alternative format please contact the Senior Officer: Diversity at diversity@nptcgroup.ac.uk or on 01639 648175 or 07825 231627.

Section 1: Context

- 1.1 It is the College's policy to conduct all of its business in an honest and ethical manner. The College takes a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships wherever the College operates and to implementing and enforcing effective systems to ensure modern slavery is not taking place anywhere within its business or in any of its supply chains.
- 1.2 The College is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.
- 1.3 The purpose of this policy is:
 - 1.3.1 To set out the responsibilities of the College, and of those working for it, in observing and upholding its position on anti-slavery and human trafficking.
 - 1.3.2 To provide information and guidance to those working for the College on how to recognise and deal with modern slavery issues.
- 1.4 If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership, age or race they should contact the HR Unit or Senior Officer: Diversity in the first instance for advice.

Section 2: Status

- 2.1 The policy and procedures have been reviewed by the Vice Principal: Corporate Services, and approved by the Senior Management Team of the NPTC Group on 07.09.16 and the Joint Information and Consultative Committee (JICC) meeting held on 14.09.16.
- 2.2 This policy has undergone Equality and Linguistic Impact Assessment on 08.08.16 and is attached as an appendix.

Section 3: Policy Statement

3.1 Policy Statement

- 3.1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and

human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

- 3.1.2 This policy does not form part of any employee's contract of employment and it may be amended at any time.

3.2 Scope

- 3.2.1 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.

3.3 General Principles

- 3.3.1 The College expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the College includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The College expects that its suppliers will hold their own suppliers to the same high standards.

3.4 Accountability and Responsibility

- 3.4.1 The Board of Governors has overall responsibility for ensuring this policy complies with legal and ethical obligations. The Chief Executive Officer and Senior Management Team have overall responsibility to ensure that all those under their control comply with the policy.
- 3.4.2 The Modern Slavery Act Working Group has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.4.4 Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

Section 4: Procedure

- 4.1 The prevention, detection and reporting of modern slavery in any part of the College's business or supply chains is the responsibility of all those working for the

College or under its control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 4.2 Staff must report it in accordance with the College's Whistleblowing Policy as soon as possible if they believe or suspect that a conflict or a breach with this policy has occurred, or may occur in the future. Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the College business or its chains of any supplier tier at the earliest possible stage.
- 4.3 If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager or Assistant Principal: HR .
- 4.4 The College aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The College is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should inform the Assistant Principal: HR or Vice Principal: Corporate Services immediately. If the matter is not remedied, and they are an employee, it should be raised formally using the College's Grievance Policy.

Communication and Awareness of this Policy

- 4.5 Training on this policy, and on the risk the College business faces from modern slavery in its supply chains, forms part of the induction process for all members of staff and regular training will be provided as necessary.
- 4.6 The College's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

- 4.7 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.8 The College may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

Section 5: Monitoring

- 5.1 The Policy and Procedure are to be monitored by Assistant Principal: HR, Vice Principal: Corporate Services and the Governance Officer.

Section 6: Review

- 6.1 The Policy and Procedure are to be reviewed by the Assistant Principal: HR and the Vice Principal: Corporate Services.
- 6.2 The policy will be reviewed biennially.
- 6.2 The next date for review is September 2018.

Equality and Linguistic Impact Assessment & Screening Document

This document is used to record the assessment of whether or not a policy, practice or provision - or a change to them - will have a negative or positive impact on the equality of a protected characteristic or on the use of the Welsh Language.

Stage 1 – Initial Screening

Firstly consider what item is being assessed and what is its purpose?

Using the boxes below, provide a description of the policy, practice or provision being assessed with a short statement about what the item is intended to achieve (its aims and objectives) and who is affected, eg staff, students, parents/carers, partners, etc.

Description of item: Anti-slavery and Human Trafficking Policy
Aims & objectives: To ensure the Group complies with UK laws regarding modern slavery.
Those affected – eg staff, students, parents, partners etc : 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.

Considering the item being assessed, use the boxes below to record your initial thoughts on the possible consequences for the nine protected characteristics and the use of the Welsh Language.

Protected Characteristic	Potential impact positive or negative
Sex Also called gender, means a man or a woman	Positive
Race Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins	Positive

Protected Characteristic	Potential impact positive or negative
Age Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	Positive
Gender Re-assignment The process of transitioning from one gender to another	Positive
Sexual Orientation Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	Positive
Religion & Belief Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	Positive
Pregnancy & Maternity Pregnancy is when expecting a baby, Maternity refers to period after the birth	Positive
Marriage & Civil Partnership Marriage - between same or opposite sex couples, Civil Partnership - between same sex couples	Positive
Disability Any long term condition that effects day to day activity. Conditions include hearing, visually & physical impairment, learning disability, mental health, cancer, HIV & MS	Positive

Welsh Language	Potential impact positive or negative
<p>The Welsh Language (Wales) Measure 2011 establishes equal rights for Welsh speakers, based on the principles In Wales, the Welsh language should be treated no less favourably than the English language & persons in Wales should be able to live their lives through the medium of Welsh if they choose</p>	
Explanation – if appropriate	
Priority Level: high / medium / low High	

Stage 2 – Analysis

Based on the screening process above you will need to carry out analysis to verify your initial decision. Below you need to show what equality and linguistic analysis has been done on this item? List the evidence, data or sources used to analyse the impact of this item. (include any, data, reports, surveys or web links utilised in the process)

Protected Characteristics	Data Source & Findings
Sex	We will be monitoring how the policy and procedures work in practice and in 12 months' time will take into account any relevant feedback or information.
Race	
Disability	
Sexual Orientation	
Age	

Pregnancy & Maternity	
Marriage & Civil Partnership	
Religion & Belief	
Gender Re-assignment	
The Use of the Welsh Language	Data Source & Findings
Welsh	

Stage 3 – Engagement / Consultation & Assessment

Following your analysis, you now need to record how you have assessed the item and who was engaged in the process. How was an assessment of the equality and linguistic impact reached, who was involved in the decision?

Group impacted	Nature of positive and/or negative impact or explanation for no identified impact
Sex	This will be on-going and any feedback from engagement will inform the annual review
Race	
Disability	
Sexual Orientation	
Age	
Pregnancy & Maternity	
Marriage & Civil Partnership	
Religion & Belief	
Gender Re-assignment	

Welsh	
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Stage 4 – Mitigation & Changes

Finally, detail what changes have been made or are scheduled for change following the assessment & engagement to reduce or eliminate any adverse impact?

Impact	Possible change	Recommended & actioned
Not applicable as no adverse impact anticipated.		
Readability issues	Formatted in line with publication guidelines	completed
Accessibility	Improved contact details and methods of contact	Completed

Statement of justification and mitigation where negative impact cannot be avoided

N/A

Record of Evidence

1. Consultation

What consultation has taken place? (state when and who with)

Consultation process	Findings

2. Publication

When will the E&LIA be published?

Date and method:

As an appendix of the policy

3. Monitor & Review

How will this item be reviewed & monitored

Lead person or group responsible and review dates :

Catherine Lewis: Vice Principal: Corporate Services

Checklist

- Has the alternative format statement been included at the start of the policy document?
If you or someone you know would like this document in an alternative format please contact the Senior Officer: Diversity at diversity@nptc.ac.uk or on 01639 648175
- Has the document been formatted in line with NPTC Group publication guidelines and policy template?
- Has the Equality & Diversity paragraph been included at the end of section 1 for all policies?
If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, age or race they should contact the Senior Officer: Diversity Officer, in the first instance for advice.
- When you have completed the paperwork please ensure it is added as an appendix to the relevant policy or procedure
- Any questions? please contact the Senior Officer: Diversity on 01639 648175 or by email lesley.blower@nptcgroup.ac.uk

Signature of Assessment Manager & other staff completing ELIA

Name (s) – please print

Catherine Lewis
Vice Principal: Corporate Services

Lesley Blower
Senior Officer: Diversity

Signature (s)

Date 10.08.16