



Modern Slavery & Human Trafficking Policy and Statement

DEPARTMENT	HUMAN RESOURCES
DATE ISSUED	MARCH 2025
REVIEW DATE	MARCH 2026
VERSION	2

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1. Introduction

Walsall College ("the College") is committed to preventing modern slavery and human trafficking across all its operations and supply chains. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015. The policy and its procedures ensure the absolute prohibition of modern slavery in all forms within the College's products and services.

Modern slavery manifests in various ways, including slavery, servitude, forced or compulsory labour, and human trafficking. At its core, it involves the deprivation of an individual's liberty for exploitation. The College upholds the highest ethical standards and actively prevents any form of modern slavery within its operations and supply chains.

2. Scope

This policy applies to all governors, staff, students, contractors, suppliers, and partners associated with the College. The College expects all parties to adhere to and uphold the principles outlined in this policy.

3. Our Commitment

Modern slavery, including forced labour, bonded labour, and human trafficking, is a crime and a violation of fundamental human rights. The College has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and transparently in all its activities.

4. Organisational Structure

The College was incorporated under the Further Education and Higher Education Act 1992 for the purpose of conducting The College. It is an exempt charity for the purposes of Part 3 of the Charities Act 2011. The College's main business is to deliver education and training to students aged 16 and upwards across various programs, with approximately 900 staff and an annual turnover of circa £50m.

5. Policies & Procedures

The College has implemented the following policies to combat modern slavery:

- **Staff Code of Conduct:** Our Code of Conduct outlines expectations for ethical behaviour and compliance with all applicable laws.
- **Value for Money** Information is included in the Financial Regulations- these documents reflect the College's commitment to acting ethically and with integrity in its business relationships.
- **Financial Regulations and Procurement Policy** The College is committed to ensure fairness, cost effectiveness, and compliance with regulations and value for money.

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- **Supply Chain Policy (Subcontracting)** It focuses on the ethical sourcing, risk management, environmental responsibility, legal compliance, supplier standards, and operation efficiency.
- **Whistleblowing Policy** Staff, students, and third parties are encouraged to report any concerns or suspicions of modern slavery without fear of retaliation.
- **Recruitment and Selection Procedures** These ensure transparent recruitment processes and prevent illegal working.
- **Bribery Policy** The College is committed to the highest standards of ethical conduct and integrity in its business activities.
- **Safeguarding Policy – Human Trafficking** The College is committed to ensure the protection of individuals, from harm, exploitation, and abuse.

6. Responsibility for Anti-Slavery Initiatives

The Corporation has overall responsibility for approving and monitoring this Policy. The Senior Management Team and College Managers have responsibility for implementation, ensuring operational compliance with the College's legal and ethical obligations, monitoring its use and effectiveness. Compliance with the Policy will be assessed periodically as part of the internal audit cycle.

The Head of HR takes overall responsibility for supporting and overseeing anti-slavery initiatives, with specific responsibilities assigned as follows:

Roles	Area of responsibility relating to modern slavery
Interim Director of Finance	Procurement & Supply Chain
Head of HR	Ensuring ethical recruitment, employment practices, and workforce compliance. Leading staff awareness, training, and reporting mechanisms.
Assistant Principal – Adults & WBL	Business Development, Sub-contracting, & HE
Assistant Principal – MIS, Information & Student Services	Contract & Compliance, Safeguarding, & Student Services
Deputy Principal – Curriculum, Innovation & Student Success	Awareness to all students of Modern Slavery and how to identify it and seek support through tutorials.

7. Due Diligence Processes

The College implements robust due diligence procedures to assess and manage the risk of modern slavery in our operations and supply chains. These include:

- Assessing potential risks in new and existing supplier relationships.
- Monitoring compliance through audits and reviews.
- Engaging with stakeholders to promote awareness and best practices.

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- Removing non-compliant suppliers from our approved lists.
- Checking our supply chains for signs of modern slavery.
- Protecting whistle blowers.

As a further education institution, The College operates within the United Kingdom across various departments, including academic faculties, student services, and administrative functions. Our supply chains encompass a range of goods and services, such as educational materials, catering, facilities management, and IT equipment. The College engages with both local and national suppliers, ensuring that all partners adhere to ethical standards.

8. Procurement and our Supply Chain

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 identified as carrying material risks of modern slavery occurring 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 that wishes 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.

The College will review the due diligence processes for monitoring and managing identified risks including risks associated with countries and products.

9. Recruitment Practices

In our recruitment process, the College is committed to minimising the risk of involvement in modern slavery, including human trafficking, slavery, servitude, and forced or compulsory labour. By strictly adhering to statutory recruitment requirements outlined in our Safer Recruitment Policy, the College aims to prevent any inadvertent association with modern slavery practices. Should any potential victims be identified, the College will handle these concerns by promptly reporting them to the relevant authorities and consulting recognised organisations equipped to support individuals affected by modern slavery.

Temporary staff and staff recruited indirectly by the College are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, the College conducts check on such agencies before they are approved.

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.

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10. Training & Awareness

The College provides training to staff, students, and key stakeholders to ensure they understand the risks of modern slavery and can identify and address potential issues. This includes:

- Recognising signs of forced labour or human trafficking.
- Understanding reporting mechanisms and responsibilities.
- Specialised training for staff involved in procurement and contract management.
- Be clear about our recruitment procedure and only used agreed, reputable recruitment agencies.

11. Reporting & Accountability

The College takes all reports of suspected modern slavery seriously. Reports can be made to the Head of Governance, Lesley Venables at lvenables@walsallCollege.ac.uk

The College investigates all allegations promptly and take appropriate action.

The Corporation will review the policy annually and will receive an annual report of any modern slavery concerns from the Head of Governance.

12. Monitoring and Continuous Improvement

The College is committed to continuously improving our practices to combat modern slavery. This includes:

- Annual policy reviews.
- Enhanced supplier transparency.
- Publishing an annual Modern Slavery and Human Trafficking Statement.
- Implementing performance indicators.

13. Performance Indicators

Where the College has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The College will consider setting and reviewing KPIs in the following contexts:

- Fair Compensation: Ensuring all staff receive wages that meet or exceed legal requirements, with aspirations to offer competitive remuneration, contingent upon financial viability and government funding.
- Use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery.
- Assessment of third-party suppliers of relevant goods and services and their supply chains
- Training Completion: Measuring the proportion of staff who have completed modern slavery awareness training.
- Incident Reporting: Monitoring the number of reported incidents related to modern slavery and the outcomes of investigations.

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14. Approval and Publication

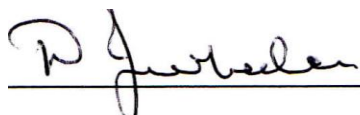
The College will produce an annual Slavery and Human Trafficking statement to be signed by the Chair of the Corporation and the Principal. This statement will be published within six months of the end of each fiscal year, i.e., by July of each year.

A link to this statement will be placed on the College's home page. Through this means, the statement will be made available to all staff members, stakeholders and 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.

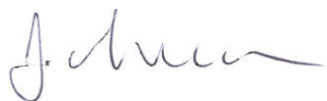
For any general concerns regarding anti-slavery, there is a wealth of information and contact points through the following link:

<https://www.antislaverycommissioner.co.uk/resources>

Approved by the Corporation on 27 March 2025



David Wheeler
Chair of the Corporation



Jatinder Sharma CBE DL
Principal & Chief Executive

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