



Anti Modern Slavery Statement

Reviewed: February 2026	Next review due: February 2027
Approving Body: Corporation	Date Approved: 9 March 2026
Author: Director of Governance	

*This procedure may need to be reviewed before the review date stated, to reflect changes in government and other agencies' advice, guidance and legislation

Revision Log

Date	Version No.	Brief detail of change
Feb 26	1	<p>Inclusion of revision log.</p> <p>Reviewed and updated to align more closely with the Home Office guidance <i>Transparency in Supply Chains: A Practical Guide</i> and to strengthen compliance with Section 54 of the Modern Slavery Act 2015.</p> <p>Section 5 heading updated from 'Categories of Supply Chains' to 'Organisational Structure and Supply Chains'.</p> <p>Inclusion of Section 6: Our Policies.</p> <p>Section 7: Due Diligence updated to enhance transparency.</p> <p>Inclusion of Section 8: Risk Assessment and Management.</p> <p>Inclusion of Section 9: Training and Awareness</p> <p>Inclusion of Section 10: Effectiveness and Monitoring to explain how compliance is monitored.</p> <p>Inclusion of Section 11: Future Priorities.</p> <p>Separate section included for 'Approval'.</p> <p>Review frequency updated to annually.</p>

Contents

- 1. Introduction 4
- 2. Policy Statement 4
- 3. Our Commitment..... 4
- 4. Identified Risks and Steps Being Taken 4
- 5. Organisational Structure and Supply Chains 4
- 6. Our Policies..... 5
- 7. Due Diligence Processes 5
 - Supplier Due Diligence..... 5
 - Agency Staff 5
 - Direct Recruitment 5
 - Students 5
- 8. Risk Assessment and Management 5
- 9. Training and Awareness..... 6
- 10. Effectiveness and Monitoring 6
- 11. Future Priorities..... 6
- 12. Approval..... 6

1. Introduction

City College Plymouth (the 'College') is a leading provider of vocational, professional and technical training in the South West, that strives to provide a learning environment and organisational culture that impacts positively on the health, wellbeing and sustainability of our community, to enable all our students and staff to achieve their full potential.

The term 'College Community' includes all staff, governors, students, parents/carers, volunteers and visitors.

Our vision:

- The learning destination of choice

Our core values:

- Respect
- Ownership
- Integrity

2. Policy Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that City College Plymouth has taken during the financial year ending July 2025 to prevent modern slavery and human trafficking in our operations and supply chains.

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. Our Commitment

The College is committed to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to safeguard against modern slavery.

4. Identified Risks and Steps Being Taken

The College has identified the following areas of processing activities that may attract risk associated with modern day slavery and human trafficking:

- in its supply chains
- through the use of agency or temporary staff
- through staff recruitment
- students

5. Organisational Structure and Supply Chains

The College is a further education provider operating in the United Kingdom. Its supply chains include, but are not limited to:

- Estates and construction services
- Cleaning, security and facilities management
- Catering services
- ICT equipment, software and AV services
- Engineering, construction, hair and beauty consumables
- Laboratory equipment and consumables
- Professional services (People Management, finance, consultancy)
- Agency and temporary staffing

We recognise that certain sectors present higher inherent risks of modern slavery, particularly construction, cleaning, catering, agency labour, ICT hardware manufacture and overseas supply of goods.

6. Our Policies

The College maintains policies that support ethical conduct and help mitigate the risk of modern slavery and human trafficking, including:

- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Recruitment and Selection Policy
- Procurement Policy
- Financial Regulations

Our whistleblowing arrangements enable staff, students, suppliers and other stakeholders to raise concerns confidentially.

7. Due Diligence Processes

The College operates due diligence processes in relation to its supply chains and employment practices. These include supplier pre-qualification checks, contractual provisions requiring compliance with the Modern Slavery Act 2015 and ongoing monitoring where appropriate.

We take the following steps to assess and manage risk:

Supplier Due Diligence

- Modern slavery compliance requirements are included in tender documentation.
- Suppliers are required to confirm compliance with the Modern Slavery Act 2015.
- Higher-value or higher-risk procurements are subject to enhanced scrutiny.
- Preferred suppliers are required to confirm annually that no relevant convictions have occurred.

Procurement activity is undertaken in line with public sector procurement regulations and ethical sourcing principles.

Agency Staff

Temporary staff are sourced through established agencies who must demonstrate compliance with relevant employment legislation and ethical labour standards.

Direct Recruitment

The College operates robust safer recruitment procedures, including right-to-work checks and employment verification processes.

Students

Whilst it is acknowledged by the College that the risk of students experiencing occurrences of modern slavery or human trafficking is extremely low, it is appreciated that whilst living within the South West, students may become aware of or entrapped into the lifestyle of a modern slave.

The College has in place easily accessible and well-known channels through its safeguarding and student journey facilities, through which students can obtain assistance, support and advice on their wellbeing.

8. Risk Assessment and Management

We recognise that risk may arise in:

- Estates and construction projects

- Facilities management and cleaning services
- Agency labour arrangements
- Overseas manufacturing supply chains (eg ICT equipment)

We mitigate risk through:

- Procurement controls and approval processes
- Contract terms and conditions
- Ongoing supplier engagement
- Safeguarding reporting routes

No confirmed instances of modern slavery were identified during the reporting period.

9. Training and Awareness

Awareness of safeguarding and exploitation risks is embedded within:

- Staff safeguarding training
- Student safeguarding education
- Procurement and contract management processes

The College continues to develop awareness across relevant staff to ensure indicators of exploitation are recognised and acted upon.

10. Effectiveness and Monitoring

We monitor effectiveness through:

- Review of safeguarding incidents and referrals
- Procurement compliance checks
- Audit and risk oversight through the Corporation and Audit Committee
- Annual review of this statement

Where concerns are identified, appropriate action is taken in line with safeguarding and contractual procedures.

11. Future Priorities

During the next reporting period, we will:

- Further develop risk-based supplier assessment processes
- Review procurement documentation to strengthen modern slavery clauses
- Enhance internal awareness of supply chain risks
- Continue to embed ethical procurement within strategic planning

12. Approval

This statement has been approved by the Corporation Board of City College Plymouth and signed on its behalf by:

Richard Stevens
Chair of the Corporation
March 2026