

Modern Slavery Policy

1. Introduction

Modern Slavery is a term used to encapsulate offences defined in the Modern Slavery Act 2015 covering slavery, servitude, forced or compulsory labour and human trafficking. Business organisations have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.

CECOS College London (CECOS) fully accepts these responsibilities and is committed to meeting its obligations under the Modern Slavery Act.

2. Application of the Policy

The Policy applies to all individuals acting on behalf of CECOS College. It will therefore apply to all staff of CECOS College and all those third parties acting on its behalf, including (but not exclusively) agents, consultants, contractors, suppliers, subsidiaries and joint venture partners, wherever they may be located.

The Policy will also apply to students when they are acting on behalf of CECOS College, either in a paid or voluntary role.

3. What is Modern Slavery?

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.

CECOS is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to mitigate the risk of modern slavery taking place anywhere in our own organisation or in any of our supply chains.

CECOS is also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

4. Responsibility for Policy

Corporate and Personal Responsibilities

Responsibility for the implementation of this Policy lies with the CECOS College Senior Management Team.

The Human Resources Manager has responsibility for ensuring that the employment policies are compliant with the Modern Slavery Act 2015.

Reporting Concerns or Incidents

All members of CECOS College are responsible for reporting concerns they may have of potential breaches of the Modern Slavery Policy as soon as possible, whether on the part of other CECOS College members or third parties. This includes any instances where members themselves the victim of a policy breach may be. In turn, CECOS College is committed to ensuring that its members have a

safe and confidential way of reporting suspected wrongdoing. Concerns may therefore be raised directly with Heads of Department/ the Directors/ the Principal.

CECOS College Whistleblowing Code of Practice also permits staff, students and anyone contractually associated with CECOS College to raise concerns of serious malpractice in the College.

Any allegations of misconduct under this Policy within CECOS College will be taken seriously. Should any member of CECOS College be found to have acted in contravention of this Policy or the related UK legislation, action will be taken under the CECOS College's Disciplinary Procedures. Breaches or attempted breaches of the policy may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

5. Monitoring and Review

CECOS College is committed to reviewing on an ongoing basis the effectiveness of its policies and procedures in relation to the prevention of Modern Slavery. The application of the Policy will therefore be subject to the CECOS College's audit processes.