

Modern Slavery and Human Trafficking Policy

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Policy Name	Modern Slavery and Human Trafficking Policy	Policy Number	V1:1
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Effective Date	01/03/2026	Date of Last Revision	01/03/2026	Version Number	1.1
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Responsible Officer	Priya Nair	Contact Email	priya@cecos.ac.uk
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Scope

This policy applies to:

- All CECOS staff (permanent, temporary, agency, and contractors)
- Senior Leadership Team (SLT) and Governance Board
- Suppliers, subcontractors, and partners
- All College operations within the UK

Policy Statement

CECOS College London is committed to:

- Preventing modern slavery and human trafficking in all its activities
- Ensuring ethical and transparent practices across operations and supply chains
- Acting with integrity in all business relationships

The College operates a **zero-tolerance approach** to:

- Modern slavery
- Forced or compulsory labour
- Human trafficking
- Exploitation of any kind

Relevant Legislation

Title	Date
Modern Slavery Act	2015
Employment Rights Act	1996
Equality Act	2010
Immigration, Asylum and Nationality Act	2006

Related Policies

Title	Effective Date
Safeguarding and Prevent Policy	01/03/2026
Whistleblowing (Raising Genuine Concerns) Policy	01/03/2026
Code of Conduct	01/03/2026
Recruitment and Selection Policy	01/03/2026

Version History

Version	Approved By	Revision Date	Details of change
1:1	Hariss Pervez	01/03/2026	Refreshed

Exceptions

- There are no exceptions to this policy
- Any suspected breach must be reported and investigated

Additional Comments

Governance, Ownership and Accountability

Area	Responsibility	Role
Strategic Oversight	Governance Board	Ensures compliance and ethical standards
Executive Accountability	Chief Executive	Overall responsibility
Operational Leadership	Principal	Policy implementation
Safeguarding Oversight	DSL	Protection of learners
Compliance Monitoring	Senior Leadership Team	Monitoring and reporting

Policy Approval and Review

- This policy will be reviewed **annually (minimum)**
- Next review date: **March 2027**

Version	Date	Summary of Changes	Next Review
1.1	March 2026	Added governance, review date, and compliance clarity	March 2027

Responsibilities

Senior Leadership Team (SLT):

- Ensure compliance with this policy
- Monitor risks within operations and supply chains

Staff:

- Remain vigilant to signs of modern slavery
- Report concerns immediately

Suppliers and Partners:

- Must comply with anti-slavery requirements
 - Expected to demonstrate ethical practices
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Risk Areas

Potential risk areas include:

- Recruitment and employment practices
 - Third-party suppliers and subcontractors
 - International partnerships (if applicable)
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Due Diligence

CECOS will:

- Conduct appropriate checks on suppliers
- Include anti-slavery clauses in contracts

- Review supply chains where risks are identified
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Reporting Concerns

Any concerns should be reported via:

- Line management
- Senior Leadership Team
- Whistleblowing Policy

Reports will be:

- Taken seriously
 - Investigated promptly
 - Handled confidentially
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Protection for Whistleblowers

- Staff raising concerns in good faith will be protected
 - No victimisation or retaliation will be tolerated
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Training and Awareness

- Staff will receive appropriate awareness training
 - Key staff will receive additional safeguarding and compliance training
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Monitoring and Compliance


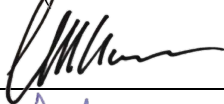

- Policy effectiveness reviewed annually
 - Compliance monitored by SLT and Governance Board
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Non-Compliance

Failure to comply may result in:

- Disciplinary action
 - Termination of contracts (for suppliers/partners)
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Approval and Sign-Off

Role	Name	Signature	Date
Chief Executive	Dr Mudassir Tanveer		20/04/2026
Principal	Chris McLean		20/04/2026
Governance Board Representative	Paul Jones		20/04/2026