Waltham International College

5.0 Staff Related Policies



5.9 Modern Slavery Policy

Version Number:	**10**
Reviewed by | Approved by:	Compliance Review | BOG
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Compliance Alignment Statement

This version of the Modern Slavery Policy has been aligned to current UK and Office for Students requirements as of May 2026. The substantive changes are listed below.

Version Control Statement

Version	Date	Changes	Reason	Author	Next Review
1	24/01/2018		New policy Statement	Director of Quality and Curriculum	23/01/19
2	23/01/2019	Relevant WIC Policy names updated	Checked for any updates	Head of FE	22/01/20
3	20/01/2020	No changes	Updates Check	Head of FE	15/01/21
4	July 2020	Minor Changes	Annual Review	Head of HE	Jul/Aug 21
5	July 2021	Minor Changes	Annual Review	AP Quality FE	Jul/Aug 22
6	July 2022	Minor Changes and inclusion on the front page of external reference and related policies	Annual Review	AP Quality FE	Jul/Aug 23
7	July 2023	No Changes	Annual Review	HR	July 2024
8	July 2024	No Changes	Annual Review	HR	July 2025
9	September 2025	Changed to the new template Removed statement and incorporated into added Purpose and Scope Expanded 4.2 Policy statements	Annual Review	HR Quality	August 2026
10	May 2026	Expanded the external reference list Added 4.3 whistleblowing route Added 4.4 mandatory staff training Added 4.5 due-diligence procedure for international student-recruitment agents Added 4.6 supplier risk-tiering Added 4.7 voluntary publication on the Home Office registry.	Compliance Alignment 2026 (OfS)	External review	August 2027

External Reference Points

- Modern Slavery Act 2015
- Public Interest Disclosure Act 1998 (whistleblowing)
- Equality Act 2010
- Bribery Act 2010 (procurement integrity)
- Gangmasters and Labour Abuse Authority (GLAA) reporting framework
- Home Office Modern Slavery Statement Registry (voluntary publication)

Related Policies and Documents

Affects all other policy documents. This document should however, be read together with the following documents:

- 1.13 Equality and Diversity Policy
- 5.01 Resourcing Policy
- 5.03 Employee Code of Conduct and Professional Behaviour
- 5.12 Bullying and Harassment Policy and Procedure
- 5.14 Disciplinary and Grievance Policy

Contents

Compliance Alignment Statement 2
Version Control Statement 2
External Reference Points 3
Related Policies and Documents 3
1. Purpose 5
2. Scope 5
3. Introduction 5
4. Policy 5
4.1 Due Diligence 5
4.2 Relevant Policies 5
4.2.1 Employee Code of Conduct and Professional Behaviour 5
4.2.2 Resourcing Policy 6
4.2.3 Equality and Diversity 6
4.2.4 Bullying and Harassment Policy 6
4.2.5 Disciplinary and Grievance Policy 6
4.3 Whistleblowing and Reporting 6
4.4 Mandatory Training 6
4.5 International Student Recruitment Agents 6
4.6 Supplier Risk-Tiering 7
4.7 Voluntary Transparency Statement 7
5. Appendices 7

1. Purpose

Waltham International College (WIC) is committed to upholding the highest ethical standards and preventing modern slavery and human trafficking in all aspects of its operations. Although WIC is not legally required to comply with section 54 of the Modern Slavery Act 2015 due to its turnover, the College voluntarily maintains a robust and up-to-date Modern Slavery Policy. This policy outlines the proactive steps WIC takes to identify, assess, and mitigate risks, ensuring that slavery and human trafficking do not occur within its business or supply chains. It reflects WIC's values of transparency, dignity, and human rights.

2. Scope

This policy applies to all staff, contractors, suppliers, and stakeholders associated with Waltham International College (WIC). It covers all operational activities undertaken by the College, including recruitment, procurement, and partnerships. The policy also extends to the due diligence processes used when engaging with external organisations, ensuring that modern slavery risks are actively considered, monitored and addressed.

3. Introduction

Waltham International College (WIC) is an alternative provider of Higher Education programmes, with campuses in Barking, East London and Birmingham. Established in 2010, the College now employs over 100 staff members. This policy supports that commitment by setting out the College's approach to preventing modern slavery and human trafficking.

4. Policy

4.1 Due Diligence

WIC undertakes due diligence (if required) when considering taking on new suppliers and regularly reviews the existing suppliers. Inquiries about businesses' understanding of the Modern Slavery Act 2015 are embedded within the business questionnaires used for suppliers, including the following:

- Mandatory exclusion for any organisation that has been convicted anywhere in the world for any offence relating to Child Labour and other forms of trafficking in human beings (including offences under sections 2 or 4 of the Modern Slavery Act 2015).
- Declaration of whether they are a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015 and whether they are compliant with the annual reporting requirements contained within the Act.

4.2 Relevant Policies

The college operates the following policies that are relevant to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

4.2.1 Employee Code of Conduct and Professional Behaviour

The Policy Sets clear expectations for ethical behaviour, safeguarding, and respect. It helps prevent exploitation by promoting a culture of accountability and integrity.

4.2.2 Resourcing Policy

The Policy ensures fair and transparent recruitment practices, reducing the risk of forced labour or exploitation during hiring processes.

4.2.3 Equality and Diversity

The Policy ppromotes an inclusive and respectful environment where discrimination, exploitation, and abuse are not tolerated. By fostering equality, the policy helps prevent conditions that may enable coercion or forced labour.

4.2.4 Bullying and Harassment Policy

The Policy ensures that all staff and students are protected from intimidation and abuse. This policy helps identify and address behaviours that could be linked to coercive control or exploitation.

4.2.5 Disciplinary and Grievance Policy

The Policy pprovides a framework for addressing unethical or illegal behaviour, including any actions that may indicate or facilitate modern slavery. It empowers staff to report concerns and ensures accountability.

All the College policies are reviewed annually, with the risks associated with slavery and human trafficking constituting part of the review process.

4.3 Whistleblowing and Reporting

Any employee, contractor, agency worker or volunteer who suspects modern slavery or human trafficking, in the College's operations or supply chain, must raise the concern immediately through the Whistleblowing Policy or directly with HR or the Principal. Disclosures of this kind are protected from detriment under the Public Interest Disclosure Act 1998. Concerns may also be reported externally to the Modern Slavery Helpline (08000 121 700) or the GLAA.

4.4 Mandatory Training

All employees, with refreshed content every two years, will complete training on modern slavery indicators (e.g. through 'Stronger Together' free e-learning or equivalent). Higher-risk roles, international recruitment, procurement, admissions, and operations / facilities managers, will receive additional role-specific training annually.

4.5 International Student Recruitment Agents

The College recognises that international student recruitment is a sector-specific area of higher modern-slavery risk. Before any agent is engaged, the College will

(a) verify the agent's registration with a recognised body (e.g. AIRC, the British Council Agent Quality Mark, ICEF)

(b) require written confirmation that the agent does not use sub-agents without disclosure

(c) embed contractual prohibitions on debt-bondage, withholding of passports and student fee fraud, and

(d) review the relationship at least annually

4.6 Supplier Risk-Tiering

Suppliers will be classified as high, medium or low risk based on

(a) geography (CSEW / Global Slavery Index)

(b) workforce profile (low-paid, migrant-heavy, agency-supplied workforces, e.g. cleaning, catering, security, construction), and

(c) procurement spend

High-risk suppliers will be subject to enhanced due diligence including a site visit where proportionate.

4.7 Voluntary Transparency Statement

Although the College's annual turnover is below the s.54 threshold (currently £36 million), the College voluntarily publishes a Modern Slavery Statement annually on the Home Office Modern Slavery Statement Registry.

5. Appendices

There are no appendices for this policy.