



# Modern Slavery and Human Trafficking Policy

Policy Ref: TMP9v2

This policy will not discriminate either directly or indirectly against any individual on grounds of sex, race, ethnicity or national origin, gender, sexual orientation, marital status, religion or belief, age, disability, socioeconomic status, offending background or any other personal characteristic.

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**Reviewed By** Martin Heaton

**Job Title** Assistant Director,  
Designated  
Safeguarding Lead

**Job Title** Director

Signed

Date

July 2020

Signed

Date

July 2020

## Record of Changes

Version	Issue Date	Changes	Initials
v1	July 2019	Initial issue	JM
v2	July 2020	General procedural review, references updated, formatting changes	JM

Date of Next Review: July 2021

## **Definition**

Throughout this policy document **TMP Studios CIC** is referred to as 'TMP College'.

## **Policy Statement**

Modern slavery is a crime and a gross 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.

TMP College has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and control to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

TMP College is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations in the Modern Slavery Act 2015<sup>1</sup>. We expect the same high standards from all our learners, contractors and other business partners. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and expect our suppliers will hold their suppliers to the same high standards.

This policy applies to all persons working for TMP College or on behalf of TMP College in any capacity, including all employees, the Director, agency workers, contractors and consultants.

## **Links to other TMP College Policies**

TMP College is committed to acquiring goods and services for its use without causing harm to others. We will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid in line with the national minimum wage.

All members of staff have a personal responsibility for the successful prevention of slavery and human trafficking with the Executive Leadership Team taking responsibility for overall compliance.

The following TMP College Policies and Procedures support our compliance with the Act:

- Single Equality Policy
- Disclosure (DBS) Policy
- Customer Feedback - Compliments, Comments and Complaints Policy
- Whistleblowing Policy
- Anti-Bribery policy
- E-Safety Policy

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2015/30/contents>

## **Aims and Principles**

TMP College provides a zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

In our supply chains, TMP College has identified the following business areas as carrying material risks of modern slavery occurring:

- Recruitment
- Security Services
- Food & Catering Services
- Construction
- Cleaning
- Stationery and Office Equipment
- Clothing (work wear)

When procuring any types of goods or services, TMP College requires any potential third party suppliers to evidence that they operate an appropriate level of corporate social responsibility during any tendering and selection process.

Any supplier or potential supplier identified as not complying with the Modern Slavery Act 2015, or TMP 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.

## **Definitions and Indicators**

- Signs that somebody has been trafficked may not be obvious but you might notice unusual behavior or events. These include somebody who:
- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for hobbies, activities and leisure
- is orphaned or living apart from their family, often in unregulated private foster care
- lives in substandard accommodation
- isn't sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- might not be registered with an educational authority, employer or a GP practice
- has no documents or has falsified documents
- has no access to their parents, guardians or family
- is seen in inappropriate places such as brothels or factories

- possesses unaccounted for money or goods
- is permanently deprived of a large part of their earnings, required to earn a minimum amount of money every day or pay off an exorbitant debt
- has injuries from workplace accidents
- Gives a prepared story which is very similar to stories given by other people.

### **Manager, Board and Staff Members**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **The Role of the Curriculum**

Young people are regularly taught about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet. Further details are given in TMP College's E-Safety Policy.

### **Staff Training**

TMP College has undertaken the following activities.

- Make staff aware of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensured that consideration of the modern slavery risks and prevention are added to TMP College's policy review process as an employer and procurer of goods and service.
- Ensure TMP College procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Delivered training sessions to staff procuring goods and services.
- Ensured ongoing engagement and communication between equality and diversity leads, our procurement team and the wider organisation.
- Continue to develop a staff awareness strategy for the Modern Slavery Act 2015 and reporting mechanisms if a case of slavery or human trafficking is suspected.
- Develop measures (e.g. KPI, assurance) to evidence our commitment to the principles of the Modern Slavery Act.
- Embed the Modern Slavery Act 2015 into our Whistleblowing Policy.

## **Policy Review**

This Modern Slavery and Human trafficking Policy will be reviewed annually as part of the overall Safeguarding Policy review.

The Director, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice. This policy does not form part of any contract of employment and may be amended at any time.

Staff members and learners are invited to comment on this policy and suggest ways in which it might be improved by emailing the Safeguarding lead: [JackieManning@music-projects.com](mailto:JackieManning@music-projects.com)

## **Procurement**

We regularly conduct training for our procurement/buying teams so that they understand the signs of Modern slavery and what to do if they suspect that it is taking place within our supply chain.

## **TMP College Management**

Responsibilities for TMP College's anti-slavery initiatives are as follows:

- Policies: The College Director is responsible for putting in place and reviewing policies.
- Risk Assessment: The College Director together with the Safeguarding Lead are responsible for analysis of the risks of human rights and modern slavery.
- Investigation/Due Diligence: the full Management Team are responsible for investigating known or suspected incidences of slavery and human trafficking.

## **Breaches of this Policy**

Any Staff member or learner who breaches this policy may face disciplinary action, which could result in dismissal or expulsion for misconduct or gross misconduct. The relevant member of the college may terminate its relationship with a Supplier if it is in breach this policy.

Parents, guardians or carers will be contacted and the incident discussed in detail, aiming to identify motivating factors, any changes in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral. A note of this meeting will be kept on the learner's file and in the Anti-Bullying, Prevent and Discrimination file.

In the event of a referral relating to serious concerns about potential modern slavery and human trafficking, TMP College will immediately contact the following:

Wigan Council initial assessment teams:

- Children and young people: 01942 828300
- Adults: 01942 828777

In an emergency we would call Greater Manchester Police on: 0161 872 5050 or 999.

### **Additional materials**

#### Government Policy and Guidance

<https://www.gov.uk/government/publications/modern-slavery-act-2015-policy-and-statement>

<https://www.gov.uk/government/collections/modern-slavery-bill>

<https://www.gov.uk/government/publications/anti-slavery-and-human-trafficking-policy>

#### Wigan Council

[www.wigan.gov.uk/togetheragainstabuse](http://www.wigan.gov.uk/togetheragainstabuse)

<https://www.wigan.gov.uk/Docs/PDF/Resident/Crime-Emergencies/TogetherAgainstAbuse-campaign-press-release.pdf>

#### UK research and innovation

<https://www.ukri.org/about-us/policies-and-standards/modern-slavery-human-trafficking/>