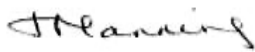




Modern Slavery and Human Trafficking Policy

Policy Ref: TMP9v8

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.

	Name	Title	Signature	Date
Prepared by	Jackie Manning	Principal		July 2026
	Kim Pulman	Director of Pastoral Care		July 2026
Approved by	Martin Heaton	CEO		July 2026

Does this Policy require publishing on the College Website? **Yes**

Does this Policy require approval by Board of Governors? **Yes**

Modern Slavery and Human Trafficking Policy

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Record of Changes

Version	Issue Date	Changes	Initials
v1	July 2019	Initial issue	JM/CF
v2	July 2020	General procedural review, references updated, formatting changes	JM/CF
v3	July 2021	Annual review, references checked and updated	JM/CF
v4	July 2022	Annual review, references checked and updated	JM/CF
v5	July 2023	Annual review, references checked and updated	JM/CF
v6	July 2024	Annual review, references checked and updated	JM/CF
v7	July 2025	Annual review, references checked and updated	JM/CF
v8	July 2026	Annual review. Updated statutory guidance and NRM/Duty to Notify pathways; strengthened safeguarding, SEND vulnerability, criminal exploitation, recruitment and supply-chain due diligence, reporting, governance and training arrangements.	KP/JM

Board of Governors Approval History

Version	Approved by	Signature	Date
v4	Dominic Kohl, Chairman of the Board of Governors		July 2022
v5	Donna Clayton, Chair of the Board of Governors		Oct 2023
v7	Claire Bolt, Board of Governors		Feb 2026

Date of Next Policy Review: July 2027

Definition

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

Policy Statement

Modern slavery is a serious crime and a gross violation of human rights. It includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can include sexual exploitation, forced labour, domestic servitude, criminal exploitation and other forms of abuse. A person may not recognise themselves as a victim and apparent agreement to aspects of their situation does not mean that exploitation has not occurred.

TMP College has zero tolerance for modern slavery and human trafficking. We are committed to acting ethically and with integrity in our education, employment, procurement and business relationships, and to taking proportionate steps to prevent, identify, report and respond to modern slavery in our own activities and supply chains.

TMP College is committed to transparency in its approach to modern slavery and to meeting any legal obligations that apply under the Modern Slavery Act 2015, including section 54 transparency-in-supply-chains requirements where applicable. We expect contractors, suppliers and business partners to uphold equivalent standards and to take appropriate action within their own supply chains.

This policy applies to all staff, governors, volunteers, agency workers, contractors, consultants, suppliers and other persons working for or on behalf of TMP College. It also sets out the safeguarding response where a learner may be a victim of modern slavery or human trafficking.

Links to other TMP College Policies

TMP College is committed to acquiring goods and services responsibly and will use proportionate due diligence to reduce the risk of forced labour, trafficking or exploitation within its supply chains. This includes considering recruitment practices, subcontracting, labour standards and identified sector or geographic risks.

All staff have a responsibility to remain alert to indicators of modern slavery and to report concerns. The Principal and senior leadership retain overall responsibility for implementation, with safeguarding leads responsible for learner safeguarding responses and relevant leaders responsible for procurement and supplier due diligence.

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

- Equality and Diversity Policy
- Disclosure (DBS) Policy
- Compliments, Comments and Complaints Policy
- Whistleblowing Policy

- Anti-Bribery policy
- Online Safety / E-Safety Policy

Aims and Principles

TMP College has zero tolerance for slavery and human trafficking and expects those working in its supply chains and contractors to share these values and comply with applicable law and contractual requirements.

TMP College will maintain proportionate, risk-based due diligence for modern slavery. Risk assessment will consider the nature of the goods or services, labour intensity, use of agencies or subcontractors, known sector risks, geographic risks, recruitment fees, worker vulnerability and any concerns or intelligence received. Controls will be reviewed where risks or circumstances change.

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

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

When procuring goods or services, TMP College may require potential suppliers to demonstrate appropriate labour, safeguarding and modern-slavery controls, including relevant policies, supply-chain due diligence, recruitment practices, subcontractor oversight and routes for workers to raise concerns. Contract terms may include modern slavery requirements where proportionate to the risk.

Where concerns about a supplier are identified, TMP College will assess the seriousness of the issue and take proportionate action. This may include seeking evidence and a corrective action plan, increasing monitoring, suspending procurement, terminating the relationship, or reporting concerns to appropriate authorities. Immediate termination will be considered where serious or deliberate exploitation is identified.

Definitions and Indicators

The College will have regard to current Home Office Modern Slavery statutory guidance and National Referral Mechanism guidance. Modern slavery concerns may overlap with child criminal exploitation, county lines, sexual exploitation, domestic abuse, financial abuse, forced labour and organised crime.

Indicators of modern slavery may be subtle and no single sign proves exploitation. Staff should consider the person's circumstances as a whole and remain professionally curious. Possible indicators include a person 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 rehearsed or inconsistent account, appears controlled by another person, is fearful of authorities, has restricted access to money/phone/identity documents, is transported to unknown locations, or shows signs of criminal exploitation such as being compelled to carry drugs, money or weapons.

Managers, Board and Staff Members

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

The Role of the Curriculum

Learners will receive age- and needs-appropriate education about exploitation, grooming, criminal exploitation, county lines, online risks, healthy relationships and how to seek help. Teaching will take account of SEND and communication needs and will reinforce that exploitation is never the victim's fault. Further detail is contained in the College's safeguarding, Prevent and Online Safety arrangements.

Staff Training

TMP College will maintain the following arrangements:

- Ensure staff understand modern slavery and human trafficking, common indicators, learner vulnerabilities and the action to take where exploitation is suspected.
- Include modern-slavery risk and prevention within safeguarding, policy review, recruitment and procurement arrangements.

- Include proportionate modern-slavery expectations in procurement strategies, supplier selection and contract terms where relevant.
- Provide appropriate training or guidance to staff involved in procurement, recruitment and contract management.
- Maintain communication between safeguarding, senior leadership, HR/recruitment, procurement and other relevant functions.
- Provide regular safeguarding updates so staff know how to report suspected modern slavery or trafficking without delay.
- Use proportionate assurance measures to review implementation, including identified risks, supplier checks, training and safeguarding concerns.
- Maintain clear whistleblowing and staff-concern routes for reporting suspected exploitation or unethical practice.

Policy Review

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

The Principal 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.

TMP College Management

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

- Policies: The College Principal is responsible for putting in place and reviewing policies.
- Risk Assessment: The Principal, Senior DSLs and relevant operational leads will review risks relating to learner exploitation, recruitment, employment and supply chains and ensure proportionate controls are in place.
- Response and Due Diligence: safeguarding concerns about a learner will be managed by the safeguarding team and referred to statutory agencies as appropriate. Employment, contractor or supply-chain concerns will be managed by the relevant senior leader, with external reporting where required. College staff must not conduct safeguarding or criminal investigations that could compromise action by Police, Social Care or other competent authorities.

Breaches of this Policy

Any member of staff who breaches this policy may be subject to disciplinary action, up to and including dismissal for serious misconduct. TMP College may suspend or terminate a relationship with a contractor or supplier where serious non-compliance is identified. A learner who may be involved in modern slavery or exploitation will first be considered through a safeguarding lens;

potential victims will not be treated as responsible for exploitation they have been compelled or coerced to undertake.

Where a learner is affected, decisions about contacting parents/carers will be made in accordance with safeguarding procedures and the learner's age, wishes, capacity and safety. Parents/carers must not be contacted where doing so could increase risk, alert an alleged exploiter or compromise a Police or Social Care response. All safeguarding concerns, decisions and actions must be recorded on Databridge.

Where modern slavery or human trafficking is suspected, staff must report the concern without delay to a Senior DSL or wider DSL team member. Urgent concerns must be reported directly and must not be left solely as an electronic record. If there is immediate danger or a crime is in progress, call 999.

The DSL will use the safeguarding referral route for the Local Authority responsible for the learner. For a child, Children's Social Care must be informed and a potential child victim must be referred into the National Referral Mechanism (NRM) by a designated First Responder. For an adult, an NRM referral requires informed consent; where a specified public authority encounters a potential adult victim who does not consent, the Duty to Notify requirements apply. TMP College is not itself listed as a designated First Responder organisation, so the DSL will work with an appropriate First Responder such as the relevant Local Authority or Police.

- Staff should not delay safeguarding action while establishing whether the NRM threshold is met. The NRM is additional to, not a replacement for, normal safeguarding referrals and Police action.
- For adults at risk, the College will also consider a Care Act 2014 safeguarding referral, consent, mental capacity, advocacy and immediate protection needs.

Emergency: 999. Non-emergency Police concerns may be reported through 101 or the appropriate local Police route. Current Local Authority safeguarding referral websites are maintained separately by TMP College so that staff use up-to-date routes for Wigan, Lancashire, Bolton, Salford, Warrington, Halton, Sefton and Wirral.

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>

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Wigan Council

Use the current Wigan Council safeguarding referral pages and TMP College Local Authority Safeguarding Referral Websites sheet.