

# Modern Slavery Policy

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This document is intended for Trinity College London (TCL) personnel and authorised external parties. This document must be handled in accordance with the TCL classification policy.

# Modern Slavery Policy

Printed copy of this document is uncontrolled and should not be relied upon as the most up to date version.

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**Overview**

Modern slavery can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty or freedom of movement by another in order to exploit them for personal or commercial gain.

Modern slavery is a crime and a violation of fundamental human rights. Trinity College London ('Trinity') is committed to ensuring that acts of modern-day slavery and human trafficking have no place in its business and supply chain.

This policy should be read in conjunction with Trinity's Statement on Modern Slavery.

**Aims of this Policy**

The purpose of this policy and supporting documentation and procedures is to prohibit modern slavery in all its forms in the delivery of Trinity products and services.

**Scope**

This policy applies to:

- Trinity's Governors.
- All Trinity employees and workers on the payroll.
- All fixed term and temporary agency workers engaged by Trinity.
- All third-party representatives and other contractors, service providers and partners working with Trinity.
- Registered Exam Centres and Registered Exam Hubs.
- Other suppliers.

The contents of this policy are not contractual. It is the responsibility of everyone listed above to familiarise themselves with, and comply with, this policy by referring to the current version which is available on our public website. Trinity reserves the right to amend this policy, as appropriate, without notice.

**What Trinity will do**

Trinity will:

- Be clear about its recruitment procedure and only use agreed, reputable recruitment agencies
- Bear the cost of recruitment agencies rather than pass them to the job applicant
- Lead by example by making appropriate checks on employees and suppliers to ensure Trinity knows who is working for them
- Ensure they have in place an open and transparent grievance process for all staff
- Ensure that Trinity's employees' rights around the world are compliant with local laws and upheld
- Check Trinity supply chains annually for signs of modern slavery
- Consider the risk of modern slavery in Trinity's procurement practices
- Train Trinity staff and representatives to spot and respond to signs of modern slavery
- Make a clear statement that Trinity takes its responsibilities concerning modern slavery seriously.

**Identifying Slavery**

There is no typical victim and some victims do not understand that they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of slavery or trafficking:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being controlled by someone else
- They allow others to speak for them when spoken to directly
- They are dropped off and collected from work
- The person is withdrawn or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive. A person may display a number of the trafficking indicators set out above but they are not necessarily a victim of slavery or trafficking. However, if you have a suspicion, report it.

### **Compliance with this Policy**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Trinity or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

### **Reporting Slavery**

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain of any supplier tier, at the earliest possible stage.

If you think someone is in immediate danger, you should contact the police.

If you have a suspicion, you may use the reporting procedures under the Policy and Procedure for Reporting Malpractice, the Whistleblowing Policy or you can contact Trinity directly on: <mailto:safeguardingreferrals@trinitycollege.com>.

### **Confidentiality**

Trinity will always endeavour to keep your identity confidential when asked to do so, although by law and regulation we may need to disclose your identity to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with court proceedings)
- another person to whom we are required by law to disclose your identity
- the national regulator responsible for the standards of the qualification(s) concerned.

You should also be aware that you may be identifiable by others due to the nature or circumstances of the disclosure.

### **Consequences of Breach**

Any employee who breaches this policy may face disciplinary action, which could result in action up to and including dismissal. Please refer to Trinity's Disciplinary Policy and Procedure. Trinity may terminate their relationship with other individuals and organisations working for or with them if they breach this policy.

### Change History

The following changes have been made to this document:

Version	Date	Author	Change Summary
0.1	2017-01-30	General Counsel	Original Policy
0.2	2018-01-31	General Counsel	Minor updates
0.3	2022-04-12	Senior Counsel & General Counsel	Minor updates plus reformatting
0.4	2023-09-19	Senior Counsel & General Counsel	Update of reporting email address and scope of policy
0.5	2024-06-04	General Counsel	Minor updates

### Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
0.3	2022-04-15	Policy Management Group
0.4	2023-09-19	Policy Management Group
0.5	2024-06-04	Policy Management Group