Modern Slavery and Human Trafficking Policy

Policy Owner: Zubair Ahmad

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Next Review Due: July 2027

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1. Purpose and Regulatory Context

AA London College Ltd is committed to preventing modern slavery and human trafficking in all its activities and relationships. This Policy sets out the College's approach to identifying, preventing, and addressing risks of modern slavery and human trafficking within its operations and supply chains.

This Policy supports compliance with:

- The Modern Slavery Act 2015
- The Office for Students' ongoing conditions of registration, in particular Condition E (Management and Governance)

The Policy forms part of the College's wider framework for ethical conduct, risk management, and regulatory compliance.

2. Policy Statement

AA London College Ltd adopts a **zero-tolerance approach** to modern slavery and human trafficking. The College is committed to acting ethically and with integrity in all its business relationships and to implementing effective systems and controls to prevent any form of exploitation.

The College will not knowingly engage with, support, or partner with organisations or individuals involved in modern slavery or human trafficking.

3. Scope

This Policy applies to:

- All employees of AA London College Ltd
- Directors and senior management
- Contractors, suppliers, agents, and business partners
- Any other individuals or organisations acting on behalf of the College

The Policy applies to all College activities, whether undertaken in the UK or overseas.

4. Governance, Accountability, and Oversight

4.1 Board Oversight

The Board of Directors has ultimate responsibility for oversight of this Policy and for ensuring that appropriate and proportionate arrangements are in place to manage risks relating to modern slavery and human trafficking.

The Board receives assurance that:

- Risks have been identified and assessed
- Due diligence processes are operating effectively
- Any material concerns are escalated and addressed promptly

4.2 Senior Management Responsibilities

Senior management is responsible for:

- Implementing this Policy
- Ensuring staff awareness and training
- Integrating modern slavery risk into procurement and risk management processes
- Escalating significant concerns to the Board

These arrangements support effective management and governance in line with OfS Condition E.

5. Risk Assessment and Due Diligence

AA London College Ltd takes a risk-based and proportionate approach to identifying and managing modern slavery risks.

5.1 Supplier Due Diligence

The College incorporates modern slavery considerations into its supplier approval and procurement processes. This may include:

- Assessing supplier policies and practices
- Seeking confirmation of compliance with relevant legislation
- Applying enhanced scrutiny to higher-risk suppliers, including those operating in higher-risk jurisdictions

The College reserves the right to terminate relationships where serious concerns are identified.

6. Reporting Concerns and Whistleblowing

All staff and associated persons are encouraged to raise concerns relating to suspected or actual modern slavery or human trafficking.

Concerns may be reported through:

- Line management
- Senior management
- The College's Whistleblowing Policy

Concerns can be raised in confidence and without fear of detriment. All reports will be taken seriously and investigated appropriately.

7. Training and Awareness

The College provides proportionate training and awareness-raising activities to ensure that staff understand:

- The nature of modern slavery and human trafficking
- How to identify potential risk indicators

- How to report concerns appropriately

Training is prioritised for staff involved in procurement, contracting, and supplier management.

8. Investigation and Response

Where concerns are identified, the College will:

- Investigate promptly and fairly
- Take appropriate remedial action
- Consider suspension or termination of supplier relationships where necessary
- Refer matters to external authorities where required by law

All actions taken will be proportionate, documented, and subject to appropriate oversight.

9. Monitoring, Assurance, and Continuous Improvement

The effectiveness of this Policy is monitored through:

- Periodic review of procurement and supplier arrangements
- Management reporting and assurance
- Review of incidents and lessons learned

The Policy is reviewed annually and updated as necessary to reflect legislative changes, regulatory expectations, and good practice.

10. Related Policies

This Policy should be read alongside:

- Whistleblowing Policy
- Fraud, Bribery and Corruption Policy
- Equality and Diversity Policy
- Safeguarding and Student Welfare policies

This Policy is approved by the Board of Directors and forms part of AA London College Ltd's regulatory compliance and governance framework.