



## UKMC Modern Slavery Policy

Date	Author	Summary of Changes	Version	Authorised
19/5/2025	Head of HR	Updates to Policy	1.1	Academic Board
Policy/Procedure Owner		The policy is overseen by the Head of HR. Day-to-day implementation and communication responsibilities are delegated to teams to investigate officers when matters arise.		
Equality Analysis		EDI Committee		
Authorised By		Academic Board		
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Next Review		July 2026		
Version		1		
Internal/External		Both		
Document Location		<a href="#">UKMC   Policies and Legislation</a> Staff portal		
Linked Documents and Policies Internal		E6 Report and Support Webpage accessible via <a href="#">UKMC   Policies and Legislation</a> UKMC Vulnerable Student Support Policy UKMC Support to Study Policy and Procedure UKMC Safeguarding Policy		
Linked Documents and Policies External		Disciplinary & Grievance Procedure Equal Opportunities Policy Employment Act 2008 Equality Act 2010 Employment Act 2002 (Dispute Resolution) Regs 2004		

	ACAS Code of Practice 2015
Dissemination Plan	The policy will be distributed via communication bulletins, and annual trainings, refreshers, or meetings events. The policy will also be published on appropriate webpages on the website or intranet.
<b>Accessibility</b>	<b>Alternative formats available on request</b>

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## 1. Introduction

1.1 Modern Slavery is a term used to encapsulate offences defined in the Modern Slavery Act 2015 covering slavery, servitude, forced or compulsory labour and human trafficking. Business organisations have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. UKMC fully accepts these responsibilities and is committed to meeting its obligations under the Modern Slavery Act. The College publishes an annual statement setting out the steps it is taking to manage effectively the risk of modern slavery existing within either the College or its supply chain.

## Application of the Policy

2.1 The Policy applies to all individuals acting on behalf of UKMC. It will therefore apply to all staff of the College and all those third parties acting on its behalf, including (but not exclusively) agents, consultants, contractors, suppliers, subsidiaries and joint venture partners, wherever they may be located. The Policy will also apply to students when they are acting on behalf of the UKMC, either in a paid or voluntary role.

## 3. What is Modern Slavery?

3.1 Modern slavery is a crime and a 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.

3.2 UKMC is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to mitigate the risk of modern slavery taking place anywhere in our own organisation or in any of our supply chains.

3.3 UKMC is also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers.

## 4. Responsibility for Policy

4.1.1 Responsibility for the implementation of this Policy lies with the Executive Board

4.1.2 The Executive Board has day-to-day responsibility for implementing this policy in respect of UKMC's supply chains, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective. The Executive Board is also responsible for communicating the requirements of the Modern Slavery Act 2015 to the College community and to suppliers and the provision of relevant training programmes where appropriate.

4.1.3 HR has the responsibility for ensuring the College's employment policies are compliant with the Modern Slavery Act 2015.

## Reporting Concerns or Incidents

4.2.1 All members of the College are responsible for reporting concerns they may have of potential breaches of the Modern Slavery Policy as soon as possible, whether on the part of other College members or third parties. This includes any instances where members themselves may be the victim of a policy breach. In turn, the College is committed to ensuring that its members have a safe and confidential way of reporting suspected wrongdoing. Concerns may therefore be raised directly with Heads of Department in the first instance.

4.2.2 The College's Whistleblowing Policy also permits staff, students and anyone contractually associated with the UKMC to raise concerns of serious malpractice to the Executive Board. The whistleblowing policy can be found at [UKMC | Policies and Legislation](#).

4.2.3 Any allegations of misconduct under this Policy within the jurisdiction of the College will be taken seriously. Should any member of the College be found to have acted in contravention of this Policy or the related UK legislation, action will be taken under the College's Disciplinary Procedures. Breaches or attempted breaches of the policy may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

## 5. Monitoring and Review

5.1. UKMC is committed to reviewing on an ongoing basis the effectiveness of its policies and procedures in relation to the prevention of Modern Slavery. The application of the Policy will therefore be subject to the College's risk management and audit processes.