

#### 1. Introduction

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London College of Practical Studies is committed to preventing slavery and human trafficking in all its forms, both within our organization and in our supply chains. We acknowledge our responsibility to take a robust approach to modern slavery and human trafficking and we are committed to improving our practices to combat slavery and human trafficking.

### **Our organization**

London College of Practical Studies is one the higher education institution in the UK, offering a wide range of undergraduate courses to a diverse student body. We employ a significant number of staff and engage with many suppliers and partners worldwide. We recognize that our operations and supply chains can potentially expose us to the risk of modern slavery and human trafficking.

### **Our Commitment**

We are committed to acting ethically and with integrity in all our business relationships. We aim to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains or in any part of our organization.

### 2. Application of the Policy

The Policy applies to all individuals acting on behalf of London College of Practical Studies. It will therefore apply to all staff of London College of Practical Studies 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 London College of Practical Studies, either in a paid or voluntary role.

# 3. What is Modern Slavery?

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 to exploit them for personal or commercial gain.

London College of Practical Studies 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.

London College of Practical Studies 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.



### **Responsibility for Policy**

### **Corporate and Personal Responsibilities**

Responsibility for the implementation of this Policy lies with the London College of Practical Studies Senior Management Team.

The HR has responsibility for ensuring that the employment policies are compliant with the Modern Slavery Act 2015.

### **Reporting Concerns or Incidents**

All members of LONDON COLLEGE OF PRACTICAL STUDIES 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 LONDON COLLEGE OF PRACTICAL STUDIES members or third parties. This includes any instances where members themselves the victim of a policy breach may be. In turn, LONDON COLLEGE OF PRACTICAL STUDIES 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/ the Directors/ the Principal.

LONDON COLLEGE OF PRACTICAL STUDIES Whistleblowing Code of Practice also permits staff, students and anyone contractually associated with LONDON COLLEGE OF PRACTICAL STUDIES to raise concerns of serious malpractice in the College.

Any allegations of misconduct under this Policy within LONDON COLLEGE OF PRACTICAL STUDIES will be taken seriously. Should any member of LONDON COLLEGE OF PRACTICAL STUDIES be found to have acted in contravention of this Policy or the related UK legislation, action will be taken under the London College of Practical Studies' 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.

# 4. Monitoring and Review

LONDON COLLEGE OF PRACTICAL STUDIES 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 London College of Practical Studies' audit processes.