

Modern Slavery Policy	
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1. Purpose

1.1 The purpose of this policy is to set out University Academy 92's (UA92) responsibilities in relation to modern slavery, including the requirement to immediately report any concerns / suspicions of modern slavery.

2 Scope

2.1 This policy applies to all colleagues of UA92. This policy also applies to contractors and third-party workers.

2.2 This policy does not apply to students, the Students Union, conference delegates or visitors, unless they are deemed employees of UA92.

2.3 Modern slavery is a serious crime and gross violation of fundamental human rights. It takes various forms including 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.

2.4 The most common form of modern slavery in the UK is forced labour. This is when people are forced to work for others under the threat of violence for little or no pay. The victims don't necessarily have to work directly for the offender, they could be employed in a legitimate job with legal working conditions but their wage may be taken by the offender by controlling the victim's bank account.

2.5 UA92 are committed to implementing systems and controls aimed at ensuring modern slavery is not taking place anywhere in our operations.

2. Definitions (where required)

This section can be used to define any technical terms or acronyms used, which may not be understood by a non-specialist reader of this policy.

Modern Slavery	Modern slavery is defined as a situation where individuals are exploited by others for personal or commercial gain, losing their freedom in the process. This includes various forms such as human trafficking and forced labour.
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3. Responsibilities

Role	Responsible for
Chief of People and Place	The Chief of People and Place has overall responsibility for the effective operation of this procedure but has delegated responsibility for overseeing its implementation to the People Team.
The People Team	<p>The People Team has day-to-day responsibility for this procedure, and you should refer any questions about this policy to them in the first instance.</p> <p>This procedure is reviewed annually by the People Team and the latest version of this policy will be available on the Handbook SharePoint site.</p>

4. Policy Statement

4.1 This notice applies to how we use your Personal Information in accordance with our Modern Slavery Policy. Read this notice in conjunction with our Privacy Policy available on UA92's website.

4.2 At UA92, we're committed to implementing systems and controls aimed at ensuring modern slavery is not taking place anywhere in our operations. In order to do this, wherever we have reasonable cause to believe a breach of this policy may exist, we may use your Personal Information to complete checks cross referencing certain key indicators of a potential issue, in order to safeguard our colleagues against Modern Slavery.

4.3 We collect your Personal Information directly from you, based on information held on your colleague record, for example, your contact telephone number and home address. We share this information with the individual colleagues who need it to do their job. If requested, or where it is required or permitted by law, we may provide information to official bodies, such as government agencies, local authorities, regulators and the police.

4.4 When used in line with our Modern Slavery Policy, your Personal Information is kept for one year before it is securely destroyed. We use security measures, including physical, administrative, and technical safeguards to protect the confidentiality of your Personal Information. These measures include encryption, security certificates, access controls, information security technologies, policies, procedures and other information security measures to help protect your Information. These measures are built into UA92's systems and Digital Infrastructure.

4.5 Your information is always processed safely inside the European Economic Area (EEA) by UA92.

4.6 When we need to use your Personal Information for a specific purpose, we have to have a legal basis to do so. The legal basis we rely upon to use your Personal Information in accordance with our Modern Slavery Policy is what the law calls Legitimate Interests. We can only do this where we have assessed that there is little or no risk to you or your Personal Information rights, and we do this by performing a balancing test assessment, supported by Kuits LLP.

5. CORPORATE RESPONSIBILITIES

5.1 To be vigilant and alert to the potential signs of modern slavery in any part of our business.

5.2 To have clear policies and procedures which are aimed at preventing exploitation and protecting our colleagues.

5.3 The cost of recruitment is a business cost and no fee or cost for recruitment must be charged to workers, directly or indirectly.

5.4 To carry out annual checks on data that might indicate colleagues are potential victims of modern slavery such as paying into duplicate bank accounts, shared residential addresses, contact numbers and emergency contact details. Any

concerns identified are investigated further to establish if these highlight a colleague is a victim of modern slavery.

6. COLLEAGUES RESPONSIBILITIES

6.1 When recruiting, managers must always follow the Recruitment Policy, as our recruitment processes ensure the risks of modern slavery are mitigated.

6.2 Only use employment agencies with clear Modern Slavery Policies, and who are open to external validation and audit from organisations such as GRI, who are appropriately licensed by the Gangmasters and Labour Abuse Authority to protect individuals against slavery and human trafficking and comply with their obligations in relation to modern slavery, which is included in their contract and Code of Conduct.

6.3 Under no circumstances must bribes be accepted to recruit or favour workers.

6.4 All new colleagues must be issued with a contract of employment on or before day 1 of employment, detailing their statutory rights and entitlements. Managers should support colleagues who require further support to understand their entitlements.

6.5 Be vigilant when completing right to work checks.

6.6 The retention of original identity documents belonging to any candidate or colleague (e.g. passports, biometric residence permits etc.) is strictly prohibited. Retention of identity documents can particularly affect international migrants and can result in restrictions on workers' freedom of movement. To create and store copies you can temporarily request these documents but make sure they're returned before the candidate leaves an assessment centre/interview.

6.7 Evidence of a colleague's bank account should be obtained on or before their first day of employment, the People team or Manager accepting the evidence should be satisfied we are paying any monies into the individual's own bank account. If not we must be satisfied that there is a legitimate reason for this and that the colleague will have access to their wages.

6.8 All managers should listen and be approachable to colleagues, if they're told something that might indicate a colleague is in an exploitative situation and may be a victim of modern slavery then they must respond appropriately. See the Doing the Right Thing section of this policy.

7. DOING THE RIGHT THING

7.1 If you have concerns, please report them.

Modern Slavery Incident or potential Indicators
Immediate threat to life or safety?
Yes – Call the Police on 999
No – report to the People team by emailing people@ua92.ac.uk

7.2 Potential victims of Modern Slavery may display one, or several, of the following general signs and indicators:

7.2.1. Isolation

- They're rarely allowed to travel on their own
- Appear to be under the control of others
- Tend not to interact with other people
- Seem unfamiliar with their neighbourhood or where they work
- Have relationships which don't seem right – for example, a young teenager appearing to be the boyfriend/girlfriend of a much older adult.

7.2.2 Restricted freedom of movement

- They don't have documents that would allow them to travel – passports, ID, etc.
- Limited opportunities to move freely
- Few personal possessions
- Wear the same clothes day-in day-out.

7.2.3 Reluctance to seek help

- Avoiding eye contact
- Appearing frightened, or hesitant to talk to strangers
- Fear of law enforcers
- Fear of deportation
- Unsure who to trust or where to get help
- Fear of violence to them or their family.

7.2.4 Physical appearance

- Signs of physical or psychological abuse, such as untreated injuries, anxiety, agitation, or appearing to be withdrawn and neglected
- They look malnourished or unkempt
- Wear clothes that are unsuitable for their work.

7.2.5 Poor living conditions

- They're living in dirty, cramped or overcrowded accommodation
- Working and living at the same address.

7.2.6 Unusual travel arrangements

- They're always be dropped off at/ collected from work; and very early in the morning or late at night
- Children dropped off/ picked up in private cars or taxis at unusual times and in places where it isn't clear why they'd be there.

7.3 You can see further details of signs of Modern Slavery at the following link: [Spot The Signs - Unseen \(unseenuk.org\)](https://www.unseenuk.org/)

7.4 If you feel you may be a victim of modern slavery or have concerns for someone else, you can call any of the following for help and support:

- UK Modern Slavery Helpline – 0800 012 1700
- The GLAA – 0800 432 0804 / 0115 959 7032

- UK Human Trafficking Centre – 0844 778 2406

7.5 Anyone who breaches this policy by engaging in or conspiring to engage in any form of modern slavery will face disciplinary action which could result in dismissal.

Document Control:

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[v1.0]	01/05/2022	New Policy	Unknown
[v1.1]	16/07/2025	New template and review	Charlotte Stoddard, People Business Partner