

GOODENOUGH COLLEGE

Anti-Slavery and Human Trafficking Policy

Goodenough College recognises its obligations under section 54 of the UK Modern Slavery Act 2015. This policy outlines our approach to ensuring that these rebarbative practices are not present anywhere within our organisation, the services supplied by our subcontractors or across our supply chain.

We are committed to combating slavery and human trafficking in all our business activities and supply chains and support the eradication of slavery, servitude, forced or compulsory labour and human trafficking globally.

This policy applies to:

- All employees, agency workers, contracted staff, trustees and volunteers of Goodenough College and its subsidiaries.
- All sub-contractors, suppliers and business partners.
- All areas of our operations, including:
 - organisation, encouragement and assistance in the education of resident members of the College from any part of the world
 - provision of accommodation for international students
 - Hotel and Short Stay operations
 - event and catering services
 - any related facilities or outsourced services.

Other College policies in relevant areas include appropriate reference to, or consideration of, the risk of Modern Slavery and Human Trafficking.

Our Commitments

We commit to the following actions:

- **Zero tolerance:** we practice a zero-tolerance stance towards modern slavery and human trafficking.
- **Supplier due diligence:** we assess all new suppliers and subcontractors to ensure they share our commitment to ethical labour standards.
- **Clear contractual obligations:** we require anti-slavery and human trafficking clauses in contracts with subcontractors and suppliers.
- **Risk assessment:** we conduct risk assessments to identify and address risks of modern slavery in our operations and supply chains, particularly in higher-risk sectors such as hospitality, cleaning, building services and catering.

- **Training:** we provide relevant training to staff, especially those involved in procurement, recruitment and contract management, to spot signs of modern slavery.
- **Reporting mechanism:** we maintain a confidential whistleblowing process for anyone to report concerns without fear of retaliation.
- **Ongoing monitoring:** we conduct regular reviews of our policies, processes and supply chains to ensure ongoing compliance and effectiveness.

Managing Risk Areas in Our Operations

We acknowledge that some operational areas may present higher risks, including the recruitment of casual or seasonal hospitality staff; use of subcontracted catering, building services, cleaning or event staff; use of overseas suppliers of food, equipment and materials.

We take specific steps to mitigate these risks, such as requiring evidence of fair recruitment practices and ethical sourcing from suppliers.

We ensure this policy is provided to all employees, contractors and suppliers; supported by training for staff in relevant roles; and publicly available on our website.

We apportion responsibility for implementing this policy to:

- **Senior management**, who ensure implementation across all departments.
- **Procurement teams**, who carry out supplier checks and ensure compliance clauses are in place.
- **Managers and supervisors**, who remain vigilant for signs of modern slavery in their teams and contractors.
- **All staff** *, who will report any concerns either directly to managers or through the College whistleblowing process.
- **College Board of Trustees**, who approve this policy and oversee compliance.

* Staff who suspect an instance of slavery or human trafficking should report their concern to their line manager *or* the designated safeguarding officer (the Registrar) *or* the HR Manager. If they feel unable to raise the matter internally, they may report it confidentially under the College whistleblowing policy, to be found in the staff handbook. All reports will be taken seriously, investigated promptly and appropriate action taken.

Compliance & Review

This policy will be reviewed annually, or sooner if required by changes in legislation or our operations. Non-compliance by employees may result in disciplinary action; non-compliance by suppliers or subcontractors may result in termination of contracts.



Alice Walpole
College Director

16th February 2026