

IBC Modern Slavery & Human Trafficking Policy

1. Introduction and Purpose

International Business College (Manchester & London) is firmly committed to upholding human dignity and eradicating all forms of modern slavery and human trafficking. These practices represent severe violations of fundamental human rights and are incompatible with our values of integrity, fairness, and respect.

This policy establishes IBCM's zero-tolerance stance toward modern slavery, servitude, forced labour, and human trafficking within our operations and across our supply chains. It sets out clear principles, responsibilities, and procedures to ensure compliance with the Modern Slavery Act 2015, as well as international human rights standards.

Through this policy, IBCM seeks to promote transparency, ethical sourcing, and accountability, ensuring that our business activities do not contribute to exploitation in any form.

2. Scope

This policy applies to: All IBCM employees, contractors, volunteers, and agency staff, regardless of role or location; All suppliers, service providers, subcontractors, and external partners engaged in delivering goods or services to IBCM; Any organisation or individual acting on behalf of IBC, including recruitment agencies and consultants. Compliance with this policy is mandatory and forms part of our contractual and ethical obligations.

3. Legal & Regulatory Framework

IBC's approach is guided by the following legal and ethical frameworks:

- Modern Slavery Act 2015 – UK legislation requiring organisations to prevent slavery and trafficking in their operations and supply chains.
- Human Rights Act 1998 – Protecting fundamental rights and freedoms.
- UN Guiding Principles on Business and Human Rights – Establishing corporate responsibility to respect human rights.
- Ethical Trading Initiative (ETI) Base Code – Promoting fair labour practices globally.
- Relevant international conventions, including those of the International Labour Organization (ILO).

4. Definitions

Modern slavery encompasses a range of exploitative practices, including:

- Forced or compulsory labour: Work performed under threat, coercion, or penalty without consent.
- Human trafficking: Recruitment, transportation, or harbouring of individuals through force, fraud, or coercion for exploitation.
- Debt bondage: Labour demanded to repay a debt under unfair or exploitative conditions.
- Exploitation: Includes forced labour, sexual exploitation, organ removal, or other forms of abuse.

5. Roles and Responsibilities

- Senior Leadership Team: Ensures organisational compliance and approves due diligence procedures, oversees reporting and policy implementation.
- Compliance Officer: Leads risk assessments and supplier audits; Maintains training records and reporting logs.
- Human Resources: Implements ethical recruitment practices and verifies identity and right-to-work documentation.
- Procurement Team: Conducts supplier due diligence and monitors contractual compliance.
- All Employees: Must remain vigilant and report any suspected modern slavery concerns immediately.

6. Risk Assessment and Due Diligence

IBCM conducts annual risk assessments to identify and mitigate potential exposure to modern slavery risks. Factors considered include:

- Sector-specific risks (e.g., cleaning, maintenance, security services).
- Geographic risks linked to labour standards in supplier countries.
- Supplier size and complexity of supply chains.
- Recruitment agency compliance with ethical standards.

Due Diligence Measures include:

- Supplier questionnaires and declarations confirming compliance.
- Mandatory inclusion of anti-slavery clauses in all contracts.
- Ongoing monitoring and renewal of checks every 12–24 months.
- Immediate termination of suppliers who fail to meet ethical standards.

7. Reporting Fraud or Corruption

Employees and stakeholders are encouraged to report concerns promptly through:

- Compliance Officer
- Senior Leadership Team

All reports will be investigated confidentially, and retaliation against whistleblowers is strictly prohibited.

8. Training and Awareness

IBCM provides mandatory training to ensure awareness and compliance: Induction training for all new staff; Annual refresher training for HR, procurement, and management teams; Supplier briefings outlining expected ethical standards and contractual obligations.

9. Non-Compliance and Remediation

Failure to comply with this policy may result in:

- Internal disciplinary action.
- Termination of contracts with suppliers or partners.
- Reporting to law enforcement agencies.
- Implementation of supplier remediation plans where appropriate.

10. Review & Version History

This policy will be reviewed annually by the Senior Leadership Team to ensure continued relevance and effectiveness.

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Originator	Quality Manager
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