



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Owner:	Director of Finance
Approved by:	Council (minor amendments) (21 June 2021)
Review due date:	June 2024
Update history:	Approved by Council (18 March 2019)

Policy statement

- 1.1 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. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 as amended from time to time (the Act). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

- 2.1 Council has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The **Director of Finance** has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the **Head of Procurement**.

3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify the **Director of Finance** as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the **Director of Finance** or report it in accordance with our [Public Interest Disclosure Policy](#) as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitute any of the various forms of modern slavery, raise it with your manager or the **Director of Human Resources**.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found [here](#).

4. Communication and awareness of this policy

- 4.1 We will implement a system of appropriate training for our employees and officers to ensure their compliance with this policy and to ensure their understanding of the risk our business faces from modern slavery in our supply chains.
- 4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 4.3 We will implement due diligence procedures for our direct subcontractors and suppliers to ensure that there is no slavery or human trafficking in our supply chains. Wherever possible, all University contracts with third party suppliers will include specific reference to that supplier's compliance with the Act and we will obtain appropriate warranties from suppliers that they conduct their business in a manner that is consistent with this policy and all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force.

5. Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.