

ANTI-SLAVERY POLICY

November 2019

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Summary

What is this document about?

This Anti-Slavery & Human Trafficking Policy sets out the University's stance on tackling these issues within our supply chain and wider organisation. It sets out the required responsibilities and provides guidance on what to do if you become aware of slavery or human trafficking.

Who is this for?

This policy applies to everyone working for the University or on behalf of the University 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.

How does the University check this is followed?

Supplier compliance with the policy is monitored by the Procurement Team.

Who can you contact if you have any queries about this document?

The Executive Director of Corporate Governance or the University Solicitor.

Executive summary

Modern slavery and human trafficking are crimes and a violation of fundamental human rights. They take 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. The University is committed to tackling modern slavery and human trafficking and acting ethically and with integrity in all our dealings and relationships. This policy sets out how we will fulfil this commitment.

Anti-slavery and human trafficking policy.

Policy statement

Modern slavery and human trafficking are crimes and a violation of fundamental human rights. They take 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. The University is committed to tackling modern slavery and human trafficking and acting ethically and with integrity in all our dealings and relationships.

We will endeavour to ensure that there is transparency both in the University and in our approach to tackling modern slavery and human trafficking throughout our supply chain and the wider organisation. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, wherever possible, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We also require that our suppliers hold their own suppliers to the same high standards.

This policy applies to everyone 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.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility for the policy

The University Executive Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Executive Director of Corporate Governance and the Executive Director of Finance have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and oversight of internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and appropriate training on it and the issue of modern slavery and human trafficking in supply chains.

Compliance with the policy

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

Preventing, detecting and reporting modern slavery as far as possible in any part of the University 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.

You are encouraged to raise concerns about any issue or suspicion of modern slavery or human trafficking in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

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 constitutes any of the various forms of modern slavery or human trafficking, raise it with your manager, the Executive Director of Corporate Governance, the Executive Director of Finance or the University Solicitor.

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 Executive Director of Corporate Governance immediately.

Communication and awareness of this policy

Our approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced in contracts and as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy may face disciplinary action.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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