

1 Introduction

1.1 Purpose of Policy

The University is committed to ensuring that its operations and supply chains are trafficking and slavery free, consistent with the Modern Slavery Act 2015. The University expects high standards from all of its employees, contractors, suppliers and other business partners, and as part of the University's procurement processes, the University includes specific prohibitions against breaches of the Act. The University expects that its suppliers will hold their own suppliers to the same high standards.

The University has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the University or in any of its supply chains.

1.2 Scope

This policy applies to all persons working for the University or on the University's behalf in any capacity, including employees at all levels, governors, officers, agency workers, seconded workers, consultants, volunteers, interns, agents, contractors, external consultants, suppliers, third-party representatives and business partners.

This policy must be read alongside and in conjunction with the University's other policies including but not limited to its Purchasing Procedures, Public Interest Disclosure Policy, Bribery Act Compliance Statement and Disciplinary Procedure.

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

1.3 Roles and responsibilities

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

The Finance Director 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.

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

Those procuring services are responsible for ensuring compliance with the University's Purchasing Procedures and ensuring that the University's Annual Modern Slavery Statement is published on the University's website within 6 months of the end of the relevant financial year.

The Annual Modern Slavery Statement will be approved by the Board of Governors.

2. The Policy

2.1 Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of the University's business or supply chains is the responsibility of all those working for the University or under the University's control. All of those within the scope of this policy are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All those within the scope of this policy must notify their manager or point of contact in the University as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

The University encourages the raising of concerns about any issue or suspicion of modern slavery in any parts of its business or supply chains of any supplier tier at the earliest possible stage.

If it is believed or suspected that a breach of this policy has occurred or that it may occur individuals must notify their manager/contact within the University or Finance Director OR report it in accordance with the Public Interest Disclosure Policy as soon as possible.

If an individual is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the University or any tier of the University's supply chains constitutes any of the various forms of modern slavery, individuals must raise it with their manager/contact within the University or Finance Director.

The University encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

2.2 Communication and Awareness of the Policy

Training on this policy has been provided for the procurement team, HR team and the legal team. Wider training within the University will be provided as and when such need is identified.

The University's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter. All of the University's contracts with third party suppliers will include specific reference to that provider's compliance with the Modern Slavery Act and its own or the University's Public Interest Disclosure Policy as per the Purchasing Procedures.

2.3 Breaches of the Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The University may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

3. Equality Impact Assessment

An Equality Impact Assessment has been completed in respect of this policy.