



# MODERN SLAVERY POLICY

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Compliance to this policy is mandatory.

Document Classification: Public

## Document Control Schedule

Version	Responsible	Role	Update	Approved Date	Review Date
1.1	Mark Hardy	Deputy Head of Procurement	N/A	02/12/2025 (Vicki Jackson)	01/12/2026

## Definition (and Overview)

Modern slavery can be defined as a crime and a violation of fundamental human rights. It can take various forms all of which have a common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Types of modern slavery include but are not limited to:

- servitude – the state of being a slave or completely subject to someone more powerful
- forced or compulsory labour – work that is done by a person under threat of a penalty
- human trafficking – the unlawful recruitment or movement of people for exploitation
- child labour – the employment of children when illegal or considered exploitative
- exploitation – the treatment of someone unfairly in order to benefit from their work
- bonded labour – the pledge of a person's services as repayment for a debt
- lack of freedom of association - the denial of rights such as trade union representation

[The Modern Slavery Act 2015](#) gives law enforcement the tools to fight modern slavery, ensuring perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.

Under the Modern Slavery Act 2015, the University is legally required to publish a Modern Slavery Statement each financial year setting out the steps taken in the preceding 12 months to ensure that modern slavery is not taking place in our supply chains or any part of our business and activities.

Our [Modern Slavery Statement](#), approved by the Vice Chancellor annually, is publicly available for viewing.

## Scope

This policy applies to all employees and persons working for or on behalf of the University or representing the University in any business-related capacity, volunteers, agents, contractors, sub-contractors, external consultants, third-party representatives and Wholly Owned Subsidiaries.

## **Accountability, Responsibility and Governance**

The Head of Procurement has primary and day-to-day responsibility for implementing this policy, managing and monitoring its effectiveness, whilst the Chief Financial Officer has overall responsibility for Procurement Policy.

Heads of Schools / Professional Services Directors are responsible for ensuring those reporting to them understand and comply with this policy.

The application of this policy will be governed by the University's Finance Committee.

## **Our Policy**

### **Procurement**

The University requires as a condition of contract that suppliers abide by our [Supplier Code of Conduct](#).

All contracts will be tiered according to a risk-based methodology which determines that where contracts pose a greater risk to our Business Continuity, they are more frequently and rigorously contract managed which will include reassessments of Modern Slavery in their own supply chains.

We will assess all existing and new suppliers for Modern Slavery in their supply chains via our New Vendor and Contract Performance Review processes in accordance with our Contract & Vendor Management Policy.

An annual [Modern Slavery Assessment](#) will be run to report on improvements made and assess where further improvement may be required.

### **Training**

All members of the Procurement Team will receive annual training on modern slavery guidance and awareness. The University also provides online learning modules for any other relevant members of staff to improve their awareness.

### **Detection and Reporting**

#### **- Raising concerns**

All employees and those acting on the University's behalf are encouraged to raise concerns about any suspicion of Modern Slavery in any parts of our supply chains at any level of supply at the earliest possible stage.

Our policy is to encourage openness and we are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is or may be taking place.

Evidenced or perceived incidents of Modern Slavery in our supply chains should be reported in the first instance to the Head of Procurement who may escalate the issue to the Chief Financial Officer, Vice Chancellor and the Audit and Risk Assurance Committee as is deemed appropriate.

- **Policy breach**

Any detected breaches of this policy, or instances of Modern Slavery abuses may result in the University taking disciplinary action against any individual found to be facilitating the breach, and/or termination of any contract or relationship with any organisation or supplier.

### **Recruitment, reward, equalities and wellbeing**

The University is committed to ensuring that people are paid appropriately for the work they carry out. Its policies on recruitment, reward, equality and wellbeing support its efforts to combat modern slavery and human trafficking.

### **Support and Guidance**

Further Guidance on this policy can be obtained by referral to the [Procurement webpages](#) or by contacting the [Procurement Team](#).

### **Policy Review**

This policy will be reviewed on an annual basis in conjunction with the annual renewal of the Modern Slavery Statement and an annual check of our position according to the Government's Modern Slavery Assessment Tool.