

Anti-slavery and Human Trafficking Policy

Classification:	Policy
Version Number:	2-01
Status:	Approved
Approved by:	Council
Approval Date:	06/07/2023
Effective from:	01/08/2023
Next Review Date:	01/08/2026
Document Author:	Governance Manager
Document Owner:	USCCO
Department/Contact:	Governance
Collaborative provision:	Please state whether this document is applicable to the university's collaborative partners: <input type="checkbox"/> Mandatory <input checked="" type="checkbox"/> Not mandatory
Related documents:	Modern Slavery Act, Whistleblowing Policy, Grievance Procedure
Published location:	SharePoint Policy Directory

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1. 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. The University of Hull 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 its own business or in any of its supply chains.
- 1.2 The University recognises that there may exist links to historical or modern slavery of which they are unaware. If links are discovered, the University—through ULT and Council—will consider what, if any, action to take.
- 1.3 The University is also committed to ensuring there is transparency both in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. The University requires the same high standards from all contractors, suppliers and other business partners; therefore the contracting process includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The University expects those who supply the University to hold their own suppliers to these same high standards and will make this clear in our contracts.
- 1.4 This policy applies to everyone working for, 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 (**Relevant Parties**).
- 1.5 This policy does not form part of any employee's contract of employment and may be amended at any time.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 Council, through the University Ethics Committee, 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.
- 2.2 The University Secretary and Chief Compliance Officer (USCCO) 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. The University provides the following training which are compulsory for staff whose role contains specific core activity:

Staff Core Activity	Compulsory training	Frequency
Negotiating contracts / tenders with suppliers	Anti-bribery	Every 3 years
Procure goods and services for the University and/or a member of the central procurement team	Modern slavery	Every 3 years
Travel overseas as part of work / work with agents abroad	Anti-bribery	Every 3 years

- 2.4 Relevant Parties 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 USCCO.

3. COMPLIANCE WITH THE POLICY

- 3.1 Relevant Parties must read, understand and comply with this policy.
- 3.2 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 its control. Relevant Parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Relevant Parties must raise concerns about any issue or suspicion of modern slavery—in any parts of the University's business or supply chains of any supplier tier—at the earliest possible stage.
- 3.4 If a Relevant Party believes or suspects a breach or conflict of this policy has occurred, or that it may occur, they must notify their manager or the USCCO, or report it in accordance with the University's Whistleblowing Policy as soon as possible.
- 3.5 If a Relevant Party is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the University's supply chains constitutes any of the various forms of modern slavery, they should raise it with their manager or the USCCO.
- 3.6 The University of Hull aims 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. The University is 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 the University's business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a Relevant Party believes that they have suffered any such treatment, they should inform the USCCO immediately. If the matter is not remedied and the Relevant Party is a University employee, they should raise it formally using the Grievance Procedure or Whistleblowing Policy.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy—and on the risk the University faces from modern slavery in its supply chains—forms part of the induction process for all individuals who work for the University and regular training will be provided as necessary, as per section 2.3.
- 4.2 The University's commitment to addressing the issue of modern slavery in business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of the University's business relationship with them and reinforced as appropriate thereafter.

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 The University may terminate its relationship with individuals and organisations who breach this policy.

Version Control

Version	Author	Date approved	Relevant sections
2-01	Governance Manager		Annual review and update following comments from WISE
2-01	Governance Manager	06 July 2023	Approved by Council