

## **ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

### **1. Policy Statement**

- 1.1 The University, as a charitable educational institution, has a zero tolerance approach to modern slavery within our business and supply chains and is committed to sound corporate governance acting ethically, with integrity and enforcing effective systems and controls to improve our practices to prevent slavery and human trafficking.
- 1.2 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.
- 1.3 The University is 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 its disclosure obligations under the Modern Slavery Act 2015. The same high standards are expected from all of the University's subsidiaries, contractors, suppliers and other business partners. Wherever practicable, the University will seek to include in its contracts with business partners 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 its suppliers will hold their own suppliers to the same high standards.

### **2. Scope of Policy**

- 2.1 This policy applies to all persons working for the University 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, business partners and subsidiaries.
- 2.2 This policy does not form part of any employee's contract of employment and the University may amend it at any time.

### **3. Responsibility for the Policy**

- 3.1 The Board of Governor's has overall responsibility for ensuring that this policy complies with the University's legal and ethical obligations, and that all those under the University's control comply with it.
- 3.2 The Assistant Vice Chancellor (Resources) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.

3.3 Management at all levels are responsible for ensuring those reporting to them are made aware of and comply with this policy and attend adequate and relevant training on it and the issue of modern slavery in supply chains.

#### **4. Compliance with the Policy**

4.1 All employees, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, collaborative partners and subsidiaries (“You”) must ensure that you have read, understand and comply with this policy.

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

4.3 If you believe or suspect that a conflict with this policy has occurred, or may occur in the future you must notify the Assistant Vice Chancellor (Resources) or report it in accordance with the University’s Public Interest Disclosure Policy, available at <https://www.bolton.ac.uk/wp-content/uploads/2018/02/Public-Interest-Disclosure-Policy.pdf> as soon as possible.

4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the University’s business or supply chains at any level of supply at the earliest possible stage.

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Assistant Vice Chancellor (Resources) or report it in accordance with the University’s Public Interest Disclosure Policy, available at <https://www.bolton.ac.uk/wp-content/uploads/2018/02/Public-Interest-Disclosure-Policy.pdf> as soon as possible.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of the University’s supply chains constitutes any of the various forms of modern slavery, this must be raised with the Assistant Vice Chancellor (Resources).

4.7 The University 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.

4.8 The University is committed to ensuring that 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 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 Assistant Vice Chancellor (Resources) in the first instance.

- 4.9 If the matter is not remedied, and you are an employee, it must be raised formally using the University Staff Grievance Procedure available at <https://www.bolton.ac.uk/wp-content/uploads/2018/02/StaffGrievanceProcedure.pdf> .

## 5. Communication and Awareness of this Policy

- 5.1 Awareness of this policy will be made available to all individuals that work for and on behalf of the University.
- 5.2 Training on this policy, and on the risk that the University business faces from modern slavery in its supply chains will be provided as necessary.
- 5.3 The University's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, business partners and subsidiaries and reinforced as appropriate thereafter.

## 6. Breaches of this Policy

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

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