

<b>Owner:</b>	Chief Operating Officer
<b>Version number:</b>	3
<b>Date of approval:</b>	12 November 2021
<b>Approved by:</b>	Audit Risk and Governance Committee (ARG)
<b>Effective date:</b>	13 November 2021
<b>Date of last review:</b>	23 November 2019
<b>Due for review:</b>	November 2023

## **Anti-Slavery and Human Trafficking Policy and Procedures**

### **1. SCOPE AND PURPOSE**

- 1.1 These Policy and Procedures apply to all employees of BU, to all members of the Board (internal or external) and its Committees and to all other persons working in or for BU regardless of whether such persons have an employment contract with BU (such persons may include visiting faculty, volunteers, consultants, members of faculty or BU committees, PhD students and any person that BU has appointed as a director to the board of any company).
- 1.2 Any reference in these Policy and Procedures to a member of staff includes any person within the scope of this policy.
- 1.3 These Policy and Procedures must be followed by all staff within BU who must ensure that they have read, understood and comply with these Policy and Procedures.
- 1.4 These Policy and Procedures are intended to underpin BU's zero-tolerance approach to modern slavery and human trafficking and forms part of wider systems and controls across BU to ensure modern slavery and human trafficking are not taking place anywhere in our own business or in any of our supply chains.

### **2. KEY RESPONSIBILITIES**

- 2.1 The BU Board has overall responsibility for the implementation, monitoring and review of these Policy and Procedures and other anti-slavery and human trafficking measures.
- 2.2 The BU Board has delegated oversight of anti-slavery and human trafficking compliance activity including review and approval of these Policy and Procedures to the ARG Committee and operational responsibility at Executive level lies with the Chief Operating Officer.
- 2.3 The Chief Operating Officer has 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.

- 2.4 The Chief Operating Officer (or the Finance Director in his or her absence) shall report to every meeting of the ARG Committee as a standing agenda item about any reports made in respect of modern slavery and/or human trafficking. ARG Committee will report to the Board as appropriate.

### 3. LINKS TO OTHER BU DOCUMENTS

- 3.1 Other BU policies that may also be applicable are:

- Sustainable Procurement Policy
- Sustainable Food Policy
- Sustainability Policy
- Code of Ethical Fundraising and Donors' Charter
- Whistleblowing (Public Interest Disclosure) Policy and Procedures

## Policy

### 4. GENERAL PRINCIPLES

#### 4.1 What are Modern Slavery and Human Trafficking?

4.1.1 **Modern slavery** is a crime and a violation of fundamental human rights. It takes various forms, such as *slavery* (the assertion of ownership over a person that deprives that person of their freedom), *servitude* (an obligation to provide services imposed by coercion, including living in a person's property and the impossibility of the victim changing his condition), *forced or compulsory labour* (work or service exacted under the threat of penalty and for which the victim has not volunteered) 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.

4.1.2 **Human trafficking** means arranging or facilitating the travel of another person with a view to that person being exploited, whether or not the victim consented to the travel.

4.2 There is no typical victim of this sort of crime, sometimes victims may not recognise themselves as having been trafficked or enslaved, but the following is a non-exhaustive list which may indicate someone is a victim of slavery or human trafficking:

- The person is not in possession of their own passport, identification or travel documents which causes them to have little opportunity to move freely;
- Victims may show signs of physical or psychological abuse, or appear withdrawn;

- They may be dropped off/ collected for work on a regular basis;
  - They may be withdrawn or they appear frightened;
  - They appear to be isolated and are rarely allowed to travel on their own, seem under the control or influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work;
  - The person does not seem to be able to contact friends and family freely.
- 4.3 BU has a zero-tolerance approach to modern slavery and human trafficking and anyone who has a suspicion of it taking place within BU or our supply chains must report it immediately.
- 4.4 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 4.5 BU 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 our disclosure obligations under the Modern Slavery Act 2015. As part of our contracting processes, we include specific clauses requiring our contractors, when asked, to show the steps they have taken to ensure that neither they nor their supply chain has engaged in slavery or human trafficking as defined under the Modern Slavery Act 2015.

## Procedures

### 5. RAISING CONCERNS

- 5.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for BU or under BU's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.2 Any member of staff who has reason to suspect or be concerned that slavery or human trafficking may occur or has occurred within our business or our supply chain must promptly report their concern(s).
- 5.3 The report must be to the Chief Operating Officer copied to the Finance Director in his or her absence.
- 5.4 The person in receipt of a report shall take such further action as they deem appropriate to ensure legal compliance and appropriate remediation (where applicable).

- 5.5 Where the concern(s) may be linked in some way to a person due to receive the report under 5.3 above, the report must be made directly to the Chair of BU's Audit, Risk and Governance Committee (**ARG Committee**). The ARG Committee Chair can be contacted via the Clerk to the University Board. The ARG Committee Chair may then take, in conjunction with unaffected members of the University's Executive Team, such further action as he/she deems appropriate to ensure legal compliance and appropriate remediation (where applicable).
- 5.6 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 5.7 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, raise it with the Chief Operating Officer immediately.

## **6. What if I am worried about reporting?**

- 6.1 BU encourages all members of staff to speak up and report concerns through the above channels. This is a core part of its commitment to ethical and legal compliance and BU is committed to ensuring that individuals making reports in good faith do not suffer detriment as a result.
- 6.2 If Staff are not comfortable reporting concerns through the routes above then they should still report their concerns and are reminded of the provisions of the Whistleblowing (Public Interest Disclosure Policy) in the Staff Handbook.
- 6.3 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.4 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## **General**

## **7. REFERENCES AND FURTHER INFORMATION**

### **For advice and assistance contact:**

Legal Services (contracts and general legal advice)

Human Resources (complaints relating to detrimental treatment for implementing these Policy and Procedures)

Procurement (information regarding BU's supply chains)