

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

**2019/20**

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## 1. POLICY STATEMENT

- 1.1. Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or 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 gain.
- 1.2. Oxford Brookes University has a zero tolerance approach to Modern slavery by committing to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls, outlined within the published [Modern Slavery Statement](#), to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3. Oxford Brookes University are 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.
- 1.4. Oxford Brookes University expect the same high standards from all of our contractors, suppliers and other business partners and as part of our terms and conditions of business, Oxford Brookes University require compliance with this Policy, the Supplier Code of Conduct and the Modern Slavery Act 2015 (which includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children). Oxford Brookes University expects that our suppliers will hold their own suppliers to the same high standards.
- 1.5. This policy applies to all persons working for Oxford Brookes 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 and business partners.

## 2. RESPONSIBILITY FOR THE POLICY

- 2.1. The Vice Chancellor has overall responsibility for ensuring this policy complies with Oxford Brookes University's legal and ethical obligations, and that all those under our control comply with it.
- 2.2. The Director of Finance through the Director of Procurement 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 issues of modern slavery in supply chains.
- 2.4. This policy will be subject to annual reviews by the Director of Finance / Director of Procurement.

### 3. COMPLIANCE WITH THE POLICY

- 3.1. All employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (“You”) must ensure that you read, understand and comply with this policy.
- 3.2. 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 the University or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Oxford Brookes University’s business or supply chains at any supplier tier at the earliest possible stage.
- 3.4. You must notify the Director of Finance / Director of Procurement or report it in accordance with the Oxford Brookes University’s [Whistleblowing Procedure](#) as soon as possible, if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.5. You should note that where appropriate, and with the welfare and safety of local workers as a priority, Oxford Brookes University will give support and guidance to our suppliers to help them address coercive, abusive or exploitative work practices in their own business and supply chains.
- 3.6. 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 your manager, the Director of Finance / Director of Procurement, or through the Oxford Brookes University’s [Whistleblowing Procedure](#).
- 3.7. Further advice, support and help is available through the [Modern Slavery Helpline](#) in association with [www.unseenuk.org](http://www.unseenuk.org).
- 3.8. If you believe a person is being trafficked and is in **immediate** danger, you should call **999** straight away. You can also report suspicions of trafficking by calling 101 or visiting your local police station.
- 3.9. Oxford Brookes 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. We are 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 our own business or in any of our supply chains.
- 3.10. 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 Director of Finance immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our [Grievance Procedure](#).

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms a part of the approach Oxford Brookes University are aiming to achieve and as such, training will be provided as necessary.
- 4.2. All relevant communications on modern slavery will be provided as necessary to all employees.
- 4.3. Oxford Brookes University's zero-tolerance approach to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our 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. Oxford Brookes University may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.