

MODERN SLAVERY POLICY AND PROCEDURE

1 Introduction

- 1.1 This policy and procedure is discretionary in nature. Whilst the University expects its employees and staff to comply with this policy, it does not confer contractual rights or form part of any contract of employment and may be amended by the University or replaced at any time following appropriate consultation with recognised trade unions.
- 1.2 Breach of this policy may be addressed via the University's disciplinary and code of conduct policies.
- 1.3 This policy and procedure will be reviewed on a 3-year basis or amended in response to changes in future legislation and/or case law.

2 Ownership

The Human Resources and Procurement Departments jointly own and manages this policy on behalf of The University of Northampton.

3 Organisational Scope

This Modern Slavery Policy and Procedure is a corporate policy and applies to all employees (and workers, as applicable) of The University of Northampton including any wholly owned subsidiaries, unless an alternative policy exists, subject to any qualifying conditions.

4 Definitions

- 4.1 Modern Slavery – includes slavery, servitude, forced and compulsory labour, human trafficking which deprive a person of their liberty in order to exploit for personal or commercial gain.

5 Policy Statement

- 5.1 Under the Modern Slavery Act 2015 modern slavery is a criminal offence. The University of Northampton is committed to ensuring that modern slavery is not taking place anywhere within our own business or in any of our supply chains.
- 5.2 The University is committed to ensuring transparency in our approach to tackling modern slavery and to comply with disclosure obligations under the Modern Slavery Act 2015.
- 5.3 In employment of our own employees we prohibit modern slavery or the hiring of individuals that are under 16 years of age. We fully comply with legislation applicable to the hiring and protection of employees within the workplace and compensation for work undertaken including Health and Safety legislation and minimum wage. The University does not consider there is a risk of modern slavery being present in its directly employed workforce however we will regularly review our policies and practices.
- 5.4 The University expects all suppliers, contractors and business partners to observe the same high standards and we will include in our contracts specific prohibitions against the use of forced, compulsory or trafficked labour, or any held in slavery or servitude. We will communicate our approach to all suppliers, contractors and business partners at the outset of our business relationship (see section 7 Procurement).

6 Key Principles

- 6.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all employees, suppliers, or business partners over which we exercise control.
- 6.2 All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers must identify where additional training on modern slavery is required, for example where an employee is responsible to for managing partnerships.
- 6.4 All employees must read, understand and comply with this policy.
- 6.5 The University encourages 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 organisation or in any of our supply chains. Employees who believe they have suffered any detrimental treatment should inform their line manager or Human Resources immediately following the Grievance Policy and Procedure.

- 6.6 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary following needs analysis.

For all University colleagues, if requested, training will be provided by the Procurement team.

7 Procedure

HR

- 7.1 Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.
- 7.2 Any employee who believes or suspects a breach of this policy or the Modern Slavery Act 2015 has occurred or that it may occur must notify their line manager, the Head of Procurement & Commercial Services or HR Department as soon as possible. Alternatively, concerns can be raised using the University's Whistleblowing Policy and Procedure.
- 7.3 Employees who are unsure about whether a particular act, the treatment of workers more generally, or working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery can raise it with their line manager, Head of Procurement & Commercial Services or the HR Department.
- 7.4 Any employee who breaches this policy or the Modern Slavery Act 2015, subject to investigation, may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Procurement

- 7.5 The Head of Procurement & Commercial Services is nominated to ensure that the University of Northampton's external supply chain remains compliant in line with this policy.
- 7.6 Through self-assessment, key suppliers are required to confirm agreement and compliance with this policy.

- 7.7 The Head of Procurement & Commercial Services, at his or her discretion, will implement appropriate audits of any key supplier on identification of potential risk.
- 7.8 The University may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy or fail to allow the Head of Procurement & Commercial Services appropriate audit/assessment access.

8 Reporting

The University will provide an annual statement in compliance with the Modern Slavery Act 2015, following each financial year. The statement will be published on the University website.

9 Associated Documents

Whistleblowing Policy
 Procurement Policy/Guidelines
 Disciplinary Policy and Procedure
 Grievance Policy and Procedure

10 Version Control

Version Control	Version 1	Approval record	
Author:	Claire Cross/ Steve Booker	Approval:	TU Liaison UMT JCNC Board Approval
Date written:	August 2020	Updates:	
Current status:	TBC		
Record of Amendments			
Date	Details of Change		Approval
20 Aug 2020	6.6 Previously read: Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary following needs analysis. For the University external supply chain, if		

	<p>requested, training will be provided by the Procurement team.</p> <p>Now reads:</p> <p>Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary following needs analysis.</p> <p>For all University colleagues, if requested, training will be provided by the Procurement team.</p>	