



Modern Slavery and Human Trafficking Policy

Policy owner:	Head of Finance Operations
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Related policies:	Procurement Policy
Related procedures:	Statement of Modern Slavery and Human Trafficking

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Version History

Version	Approved by	Revisions made	Date
1	Kirsty Leigh	Adoption of standard policy format, minor updates to role nomenclatures within policy.	November 2023



1. Purpose

- 1.1 The University is committed to combatting slavery and human trafficking and to acting ethically in all its business dealings and relationships and to enforce effective systems and controls. This policy sets out how the University will ensure modern slavery is not taking place anywhere within the business or any of the supply chains.

2. Scope

- 2.1 The University of Buckingham expects the same high standards from all employees, trustees, agency workers, external consultants, interns, volunteers, contractors and suppliers and any other persons doing business with the University. The University also expects that our suppliers will hold their own suppliers to the same high standards.

3. Legislative context

- 3.1 The policy is informed by a collection of legislation and guidance, including:
- The University of Buckingham Statement of Modern Slavery and Human Trafficking
 - Modern Slavery Act 2015.

4. Policy statement

- 4.1 Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the Modern Slavery Act 2015.
- 4.2 The University view the prevention, detection, and reporting of modern slavery in any part of its business or supply chains as being the responsibility of all those working for or with the University. It therefore commits to
- Ensuring it highlights modern slavery issues within its ongoing communications programmes with the University's Departments, Faculties, and other Institutions and with current trade suppliers to maintain and increase awareness of the issue.
 - Publishing annually its anti-slavery and antitrafficking statement which will set out the University's commitment to combat modern slavery and human trafficking.
 - Encouraging anyone to raise concerns about modern slavery or report it in accordance with the University's Whistleblowing Policy as soon as possible by ensuring that anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken are supported and do not suffer any detrimental treatment.
- 4.3 The University acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the University as a higher education institution considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:
- Appropriate due diligence processes be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).



- Risk assessment of all supply chain lines in relation to modern slavery, ensuring any high-risk suppliers are monitored and audited.
- Inclusion of consideration of how to combat modern slavery and human trafficking in policies such as Dignity at Work Policy.

4.4 The University takes its commitment to Modern Slavery seriously and therefore any breaches of this policy by an employee of the University may result in disciplinary action, which could result in dismissal for misconduct or gross misconduct. In addition, the University may terminate any relationship with organisations or suppliers working on behalf of the University if they breach the policy. If someone believes that they have suffered detrimental treatment for raising concerns in good faith, they should inform their manager and/or raise it using the University's Grievance Procedure.

5. Responsibility

5.1 The Vice Chancellor has overall responsibility for ensuring:

- This policy complies with the University of Buckingham's legal and ethical obligations, and that all those under our control comply with it.
- All relevant communications on modern slavery will be provided, as necessary, to all employees.
- Training on this policy and the risk of Modern Slavery is provided as necessary.

5.2 The Head of Finance Operations are responsible for:

- The primary day-to-day responsibility for implementation of this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Undertaking periodic reviews of this policy and the Modern Slavery Statement
- Monitoring the supplier approval process to ensure all new suppliers, any changes to existing suppliers and re-activation requests ensuring all risk assessed and taken this into account.
- Managing disclosures made directly from staff of concerns about modern slavery.

5.3 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.
- Communicating the University methodology to all suppliers, contractors and business partners that may be contracted to ensure they understand the expected approach to addressing modern slavery in the University business and supply chains.
- Requesting copies of the Suppliers Modern Slavery and Human Trafficking Statements, where appropriate.

5.4 All those in scope of this policy are responsible for:



- Avoiding any activity that might lead to or suggest a breach of this policy.
- Raise any concerns they may identify in regard to Modern Slavery to their manager or report it in accordance with the University's Whistleblowing Policy as soon as possible.