

# ANTI-MODERN SLAVERY POLICY



This document sets out the University's policy governing compliance with Modern Slavery Act 2015.

<b>Version</b>	1.1
<b>Executive Sponsor</b>	Chief Operating Officer
<b>Officer Responsible for Policy/ Procedures</b>	General Counsel
<b>Consultation Process</b>	Policy Infrastructure Project Board Executive Engagement Group
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## INTRODUCTION AND CONTEXT

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

Modern Slavery involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable groups; and arranging or enabling the trafficking of persons.

Under the Modern Slavery Act 2015, the University is legally required to publish a modern slavery statement each financial year setting out the steps taken in the preceding 12 months to ensure that modern slavery is not taking place in our supply chains or any part of our own business and activities.

# 1. SCOPE OF THE POLICY

## 1.1 Purpose of the Policy

The purpose of the Policy is to help prevent modern slavery from occurring and to protect the University and staff from breaching the Modern Slavery Act 2015 and other anti-slavery laws which apply overseas.

## 1.2 What is covered by the Policy

This Policy:

- sets out the principles that all staff, business partners and contractors must follow; and
- provides further guidance on the Modern Slavery Act 2015;

## 1.3 Who is covered by the Policy

All staff, joint venture and business partners, contractors, and suppliers to the University must comply with the Policy.

The Policy does not form part of any employee's contract of employment and may be amended at any time.

## 1.4 Breach of this Policy

Any breach of this Policy and its associated procedures by staff will be investigated in accordance with the University's disciplinary procedure. A serious breach may amount to gross misconduct and could therefore result in summary dismissal. A breach of modern slavery laws may also result in the staff member being reported by the University to the police.

Any breach of this Policy and its associated procedures by business partners, contractors and other third parties will be investigated and any breach may result in relevant contracts being terminated and the third party being reported by the University to the police.

## 1.5 Policy Ownership

The Executive has approved this Policy. The Chief Operating Officer is the Executive sponsor and the General Counsel is the officer responsible for the Policy. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to the General Counsel.

# 2. THE POLICY STATEMENT

## 2.1 Guiding Principles

Slavery and human trafficking are crimes and a violation of human rights and the University does not tolerate slavery or human trafficking in any form. The following guiding principles apply to the University's activities and to activities undertaken by its suppliers:

- The University is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own activities or in any of our supply chains.
- The formation of trade unions and powers of collective bargaining should be respected.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- Workers must be free to leave employment or work after reasonable notice.
- Passports must not be taken from workers without proper legal justification.

- All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
- Any form of forced, compulsory or child (under 16 years of age) labour must not be used and the University and its suppliers must not benefit from forced, compulsory or child labour.

The University will not contract with third parties who do not follow our anti-modern slavery principles.

## 2.2 Procedures

This Policy is implemented by the Compliance Procedures.

## 3. DEFINITIONS

The terms set out in this section 3 apply to this Policy.

**Modern slavery** includes practices that can be defined as human trafficking, labour exploitation and other slavery like practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable people; arranging or enabling the trafficking of persons; or any other practice that involves depriving one person of their liberty or freedom in order to exploit them for personal or commercial gain.

According to experts from the UN Trafficking Protocol (200), **human trafficking** can be defined as the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, or the abuse of power or vulnerability with the intent of exploiting that person through prostitution; sexual exploitation; forced labour; slavery; servitude; or removal of organs.

According to the ILO Forced Labour Convention, 1930 (No. 29), **labour exploitation** can be defined as all work or service which is exacted from any person under the menace of a penalty and for which the person has not offered himself/herself voluntarily.

The Slavery Convention (1926) and Supplementary Slavery Convention (1956) defines **other slavery like practices** as attaching and exercising some form of ownership of a person which deprives them of their freedom. It includes slavery-like practices such as debt bondage, forced marriage, sale or exploitation of children.

## 4. MODERN SLAVERY ACT 2015

### 4.1 The Offences

The Modern Slavery Act 2015 makes it a criminal offence for a person to:

- hold another person in slavery or servitude;
- force another person to work in circumstances where the person knew or ought to know that the other person is being required to former forced or compulsory labour;
- arrange or facilitate the travel of another person with a view to that person being exploited; or
- procure or facilitate any of the above offences.

## 4.2 Modern Slavery Act Statement

In accordance with section 54 of the Modern Slavery Act 2015, the University prepares and publishes an annual statement to the steps taken during the financial year to prevent modern slavery in our own business and our supply chains.

The University complies with the list of information that may be included in the statement as set out in the Modern Slavery Act 2015 and set out below:

- the organisation's structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business and supply chains, measured against such performance indicators as it considers appropriate; and
- the training about slavery and human trafficking available to its staff.

Furthermore, the University has due regard for the guidance published by the Home Office entitled "Transparency in Supply Chains etc. A practical guide".

## 5. IMPLEMENTATION

This Policy is implemented by the Compliance Procedures.

If a specific case of modern slavery is identified, it should be reported to the General Counsel who will in turn report it to the police. If potential victims are in immediate danger, you should call the police straight away using the standard 999 emergency number.

In the UK, mechanisms are in place to assist victims of slavery and human trafficking. If the University identifies a potential victim they can be referred to the National Referral Mechanism to be formally identified as a victim of modern slavery and offered government-funded support.

There is a UK wide Modern Slavery Helpline - 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.



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