



# The University of Nottingham

## Modern slavery and human trafficking policy

### 1. Policy

- 1.1 The University Of Nottingham (the "University") has adopted an [Ethical Framework](#) that comprises a comprehensive set of principles, structures, policies and procedures which together demonstrate the ethical standards that the University sets across all of its activities.
- 1.2 The University expects all its staff and students to follow the ethical behaviours set out in the Nolan Principles. These are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These Principles underlie the University's Ethical Framework and are incorporated into this policy.
- 1.3 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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 or commercial gain.
- 1.4 The University has a zero-tolerance approach to modern slavery and is committed to acting ethically and with controls to take steps to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.5 The University is also committed to taking steps to ensure there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The University expects the same high standards from all of its contractors, suppliers and other business partners. Wherever practicable, the University will seek to include in its contracts specific obligations to comply with applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015, and we expect that our suppliers will hold their own suppliers to the same high standards.

### 2. Scope of Policy

- 2.1 This policy applies to all persons working for the University or on its 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.
- 2.2 This policy does not form part of any employee's contract of employment and the University may amend it at any time.
- 2.3 This policy has been approved by the University Council.

The Chief Financial Officer as the compliance officer under this policy, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.

- 2.4 Management at all levels are responsible for ensuring those reporting to them are made aware of this policy and attend relevant training on it and the issue of modern slavery in supply chains.

### 3. Compliance with the policy

- 3.1 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 us 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 our business or supply chains at any level of supply at the earliest possible stage. You must notify the Chief Financial Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. A link to the referral form for this purpose can be found [here](#).
- 3.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Chief Financial Officer as soon as possible. A link to the referral form for this purpose can be found [here](#).
- 3.5 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 Financial Officer.
- 3.6 We aim 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. 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 Chief Financial Officer 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 the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
- 4.2 Our zero-tolerance approach to modern slavery should 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 may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### 6. Interaction with other Workplace Policies and Procedures

- 6.1 This modern slavery and human trafficking policy is aligned with the [University's Ethical Framework](#). All those to whom this policy applies are encouraged to familiarise themselves with the Ethical Framework. If you have any queries about this policy please contact the Chief Financial Officer.