

University of Greenwich

Anti-Slavery and Human Trafficking Policy

1. POLICY STATEMENT

1.1 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. The University of Greenwich takes a zero-tolerance approach to

modern slavery and it is committed to acting ethically and with integrity in all its business

dealings and relationships

1.2 The University is committed to implementing and enforcing effective systems and controls to

ensure modern slavery is not taking place anywhere in its own business or in any of its supply

chains.

1.3 We 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. We 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, we require compliance with this policy and the Modern Slavery Act 2015

(which contains specific prohibitions against the use of forced, compulsory or trafficked labour,

or anyone held in slavery or servitude, whether adults or children), and we expect that our

suppliers will hold their own suppliers to the same high standards.

1.4 This policy applies to all persons working for or on behalf of the University 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.

1.5 This policy does not form part of any employee's contract of employment and may be amended

at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 The Court of Governors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The University Secretary has primary responsibility for implementing this policy. Directors of relevant Professional Services directorates will have day-to-day responsibility for monitoring its use and effectiveness, dealing with any queries about it, and reviewing 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 provided with adequate training on it and the issue of modern slavery in supply chains.

2.4 This policy will be subject to tri-annual reviews.

3. COMPLIANCE WITH THE POLICY

3.1 All employees, 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 us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

3.3 You must report it in accordance with our Whistleblowing / Public Interest Disclosure Procedure (which can be found at <https://docs.gre.ac.uk/rep/human-resources/public-interest-whistleblowing-disclosure-policy-and-procedure>) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the University Secretary or report it in accordance with our Whistleblowing / Public Interest

Disclosure Procedure as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and 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 or the University Secretary.

3.7 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 University Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found at <https://docs.gre.ac.uk/rep/human-resources/grievance-policy-and-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 will form part of university's staff training and development programme for key staff. In addition the annual statement on modern slavery will be available to all employees via a link on the University's home page.

4.2 Our zero-tolerance approach to modern slavery 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 sanctions up to and including dismissal for gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Related Policies / Procedures	Financial Regulations and Financial Procedures Whistleblowing / Public Disclosure Procedure Grievance Procedure
Related Guidance and / or Codes of Practice	Transparency in Supply Chains – A Practical Guide (Teresa May, Home Secretary)
Related Information	Modern Slavery Act 2015 The Modern Slavery Act (Transparency in Supply Chains) Regulations 2015
Policy Owner	University Secretary
Lead Contacts	John Wallace, Director of Governance & Compliance Vincent John, Director of Procurement Director of Human Resources

Approved by Court, November 2017