

University Policy on the Modern Slavery Act 2015

1. Introduction

1.1 Modern Slavery is a term used to encapsulate offences defined in the Modern Slavery Act 2015 covering slavery, servitude, forced or compulsory labour and human trafficking. Business organisations have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. The University of Warwick fully accepts these responsibilities and is committed to meeting its obligations under the Modern Slavery Act. The University publishes an annual statement setting out the steps it is taking to manage effectively the risk of modern slavery existing within either the University or its supply chain.

2. Application of the Policy

2.1 The Policy applies to all individuals acting on behalf of the University. It will therefore apply to all staff of the University and all those third parties acting on its behalf, including (but not exclusively) agents, consultants, contractors, suppliers, subsidiaries and joint venture partners, wherever they may be located. The Policy will also apply to students when they are acting on behalf of the University, either in a paid or voluntary role.

3. What is Modern Slavery?

3.1 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.

3.2 The University is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to mitigate the risk of modern slavery taking place anywhere in our own organisation or in any of our supply chains.

3.3 The University is also committed to ensuring there is transparency in our own organisation 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 suppliers.

4. Responsibility for Policy

4.1 Corporate and Personal Responsibilities

- 4.1.1 Responsibility for the implementation of this Policy lies with the University Executive Board, acting on behalf of the University Council.
- 4.1.2 The Head of Procurement and Insurance Services has day-to-day responsibility for implementing this policy in respect of the University's supply chains, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective. The Head of Procurement and Insurance Services is also responsible for communicating the requirements of the Modern Slavery Act 2015 to the University community and to suppliers and the provision of relevant training programmes where appropriate.
- 4.1.3 The Director of HR has responsibility for ensuring the University's employment policies are compliant with the Modern Slavery Act 2015.

4.2 Reporting Concerns or Incidents

- 4.2.1 All members of the University are responsible for reporting concerns they may have of potential breaches of the Modern Slavery Policy as soon as possible, whether on the part of other University members or third parties. This includes any instances where members themselves may be the victim of a policy breach. In turn, the University is committed to ensuring that its members have a safe and confidential way of reporting suspected wrongdoing. Concerns may therefore be raised directly with Heads of Department/Centre/Activity in the first instance or, where this is not felt to be appropriate, to the Secretary to Council.
- 4.2.2 The University's Whistleblowing Code of Practice also permits staff, students and anyone contractually associated with the University to raise concerns of serious malpractice in the University. Heads of Department/Centre/Activity or their representative must report any suspected breaches of the Modern Slavery Act to the Secretary to Council.
- 4.2.3 Any allegations of misconduct under this Policy within the jurisdiction of the University will be taken seriously. Should any member of the University be found to have acted in contravention of this Policy or the related UK legislation, action will be taken under the University's Disciplinary Procedures. Breaches or attempted breaches of the policy may be

considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

5. Monitoring and Review

5.1 The University is committed to reviewing on an ongoing basis the effectiveness of its policies and procedures in relation to the prevention of Modern Slavery. The application of the Policy will therefore be subject to the University's risk management and audit processes.