

# Anti-Slavery and Human Trafficking Policy



VERSION CONTROL			
<b>Version Control</b>	<b>1.0</b>	<b>Approval Record</b>	
Author(s):	<b>Legal Team</b>	Approval:	<b>Executive Team</b>
Effective Date:	<b>09 November 2020</b>	Updates:	<b>N/A</b>
Current Status:	<b>Final</b>	Approval of revision:	<b>N/A</b>
Record of Amendments			
Date	Version Number	Details of Change	Approval

## Introduction

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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We work with colleagues, students and partners from around the world and we recognise our responsibility to take the steps necessary to ensure that each part of our business and supply chain, and all our partners are operating in a way that will prevent modern slavery and human trafficking. Where we become aware of any instances of modern slavery or human trafficking within our chain of suppliers, we will take all such steps as are necessary to tackle such behaviours. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include 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. About this policy

1.1 This policy should be read in conjunction with, amongst others:

- (a) The Whistleblowing Policy
- (b) The Code of Conduct
- (c) The Staff Handbook
- (d) The Ethics Fraud and Anti-Bribery Gift Policy
- (e) The Disciplinary Policy and Procedure
- (f) The Grievance Policy and Procedure

1.2 In this policy, **Compliance Manager** means the person nominated by us to ensure compliance with this policy and is the General Legal Counsel, which at the date of issue is Vanessa Wix.

1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. Who is covered by the policy?**

2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, academics/lecturers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, wherever located (collectively referred to as **workers** in this policy).

## **3. Who is responsible for the policy?**

3.1 Our board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 Our Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 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 issue of modern slavery within Arden University and in supply chains.

3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager.

## **4. Compliance with this policy**

4.1 You must ensure that you read, understand and comply with this policy.

4.2 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. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify your manager or the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

4.4 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.

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Compliance Manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

4.6 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 Compliance Manager.

## **5. Protection**

5.1 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.

5.2 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 Compliance Manager 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 on the Intranet.

## **6. Communication and awareness of this policy**

6.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all workers, and regular training will be provided as necessary.

6.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6.3 This policy will be available to all employees within the Intranet.

## **7. Breaches of this policy**

7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We also reserve our right to raise any breach with the appropriate authorities.

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