

| Anti-Slavery and Human Trafficking Policy | | | |
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| Brief Description & Purpose: | This policy and associated procedure outlines the University's position on modern slavery and summarises its provisions for mitigating the risk of modern slavery and human trafficking in its activities and supply chains. | | |
| Applicable to (list cohorts): | Staff: <i>All staff, including Governors and co-opted Board Committee Members</i> | Students: <i>All students</i> | Third Parties: <i>All who are in a formal relationship with the University</i> |
| Effective From: | 26 June 2023 | Last Review Date: | 6 October 2025 |
| Approval Authority: | Board of Governors | Approved: | 26 June 2023 |
| Executive Owner: | Georgina Bailes, Director of Governance Services and Secretary to the Board | Business Owner: | Beth Lenney, Governance Manager |
| Next Review Date: | October 2027 | Publication External Y/N | Y |

1. Introduction

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 include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. All businesses have a responsibility to ensure that workers are not being exploited and that relevant employment, health and safety, human rights and international standards are adhered to.

1.2 The Modern Slavery Act 2015 aims to tackle such exploitation. It requires organisations with a minimum annual turnover of £36m to report on what they are doing to address modern slavery within its business and produce a "*slavery and human trafficking statement*" for each financial year. Organisations that pursue primarily charitable or educational aims (such as the University) are also required to comply.

1.3 Northumbria University is a Higher Education Corporation and Exempt Charity, and subject to the requirements of the Modern Slavery Act 2015. Our work to address the [UN's Sustainable Development Goals](#) is supported by our commitment to improving our practices to identify and mitigate modern slavery or human trafficking in any of our supply chains which include: goods and services (facilities management, professional services and technology), international recruitment, collaborative partners and students.

2. Policy Detail

2.1 Northumbria will continue to utilise updated Home Office modern slavery guidance 'Transparency in Supply Chains: A Practical Guide', which describes a number of best practices and introduces new definitions and states that MSA statements '*will be assessed by the public, investors, the media and other external parties*'.

2.2 The [Safeguarding Policy](#) sets out how the University seeks to protect children, young people and vulnerable adults from abuse or neglect including Modern Slavery and human

trafficking.

2.3 As part of our initiative to identify and mitigate risk the University will:

- continue to develop and enhance systems, processes and controls in an effort to further mitigate the risk of the existence of modern slavery in the supply chain, including appropriate training for staff as well as focusing on high-risk categories to reduce risk;
- will further develop a risk-based approach to the management of our supply chain in order to cover a larger supplier base, and to work with suppliers in high risk categories to ask that they demonstrate, rather than just confirm, compliance.
- be an active member of sector and regional groups e.g NEUPC which help public sector organisations work together to adhere to anti-slavery and human trafficking principles as well as protecting the rights of workers;
- continue to enhance its due diligence framework for the consideration of potential partnering arrangements, including research partners. It is intended that potential partners will be required to confirm and demonstrate the steps which they are taking in relation to safeguarding and related modern slavery issues;
- ensure that students at all Northumbria campuses have access to a range of specialist welfare services (available 24/7) if they wish to report a concern or request support in relation to suspected instances of modern slavery or human trafficking;
- ensure that [Human Resources Policies \(staff access only\)](#) set out workers' rights at the University;
- seek to protect staff through the Public Interest Disclosure (“whistleblowing”) Policy should they wish to raise a concern (see below), and through the [Code of Conduct: Working Together at Northumbria University](#). Further information is detailed in the [Anti-Slavery and Human Trafficking Procedure](#)

2.4 Annual Statement

2.4.1 Publication of an annual Slavery and Human Trafficking Statement within six months after the end of each financial year is required under the Modern Slavery Act 2015. The statement covers the steps that Northumbria has taken during the financial year to ensure as far as possible that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its business, including:

- Organisational structure, business and supply chains
- Modern slavery and human trafficking policies
- Business and supply chains which present a risk of slavery and human trafficking, and steps taken to assess and manage that risk
- Supply chain due diligence processes in relation to slavery and human trafficking
- Effectiveness of steps taken with reference to appropriate performance indicators
- The training about slavery and human trafficking available to its staff.

2.4.2 The statement is approved by Board of Governors and published on the University's website. The current Statement is available at [\[link\]](#).

2.4.3 If the University fails to publish a statement by 31 January each year, the Secretary of State could bring civil proceedings in the High Court for an injunction requiring compliance.

3. Key Roles and Responsibilities

3.1 The University's Governance Services leads on anti-slavery and human trafficking and

works closely with colleagues and, in particular, the University's Sustainability Management Group, chaired by the Pro Vice-Chancellor (Strategic Projects), to determine the University's risk appetite and subsequent Modern Slavery 'standards', identify roles and responsibilities in relation to new tenders, and assess the impact of the above in terms of resource requirements (people and/ or budgets). These standards inform a risk-based approach to procurement in the key categories identified which in turn inform contract owner decision making in reference to supplier responses to the University's Modern Slavery standard.

4. Definitions

4.1 Modern slavery: 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 include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

4.2 Human trafficking Human trafficking is modern-day slavery and involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. Traffickers use force, fraud, or coercion to lure their victims and force them into labour or commercial sexual exploitation.

4.3 Supply chain A supply chain is the entire process of making and selling commercial goods, including every stage from the supply of materials and the manufacture of the goods through to their distribution and sale.

4.4 Safeguarding Safeguarding adults includes: Protecting their rights to live in safety, free from abuse and neglect. People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.

4.5 Whistle blowing Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.

5. Related Policies, Procedures and Other Resources

The following Policies and Procedures are available on the [University Policy Page](#)

- Public Interest Disclosure (Whistleblowing) Policy and Procedure
- Risk Management Policy and Risk appetite statement
- Safeguarding Policy, procedure and training resources
- Treasury Management and Ethical Investment Policy

[Staff Code of Conduct](#)

[Financial Regulations](#)

[HR Policies](#) (staff access only)

6. Version

| Version No. | Reviewer | Date | Changes |
|-------------|---|----------------|---------------------------------|
| 1.0 | Georgina Bailes Richard Elliott Paul Steadman | 9 May 2023 | <i>Original version</i> |
| 1.1 | Clare Stogden | 6 October 2025 | <i>Change of Business Owner</i> |