

Modern Slavery and Human Trafficking Policy

Policy owner:	Head of Finance Operations
Implementation date:	November

1. Purpose
 - 1.1 The University is committed to combatting slavery and human trafficking and to acting ethically in all its business dealings and relationships and to enforce effective systems and controls. This policy sets out how the University will ensure modern slavery is not taking place anywhere within the business or any of the supply chains.
2. Scope
 - 2.1 The University of Buckingham expects the same high standards from all employees, trustees, agency workers, external consultants, interns, volunteers, contractors and suppliers and any other persons doing business with the University. The University also expects that our suppliers will hold their own suppliers to the same high standards.
3. Legislative context
 - 3.1 The policy is informed by a collection of legislation and guidance, including:
 - The University of Buckingham Statement of Modern Slavery and Human Trafficking
 - Modern Slavery Act 2015.
4. Policy statement
 - 4.1 Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the Modern Slavery Act 2015.
 - 4.2 The University view the prevention, detection, and reporting of modern slavery in any part of its business or supply chains as being the responsibility of all those working for or with the University. It therefore commits to
 - Ensuring it highlights modern slavery issues within its ongoing communications programmes with the University's Departments, Faculties, and other Institutions and with current trade suppliers to maintain and increase awareness of the issue.
 - Publishing annually its anti-slavery and antitrafficking statement which will set out the University's commitment to combat modern slavery and human trafficking.
 - Encouraging anyone to raise concerns about modern slavery or report it in accordance with the University's Whistleblowing Policy as soon as possible by ensuring that anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken are supported and do not suffer any detrimental treatment.
 - 4.3 The University acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the University as a higher education institution considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:
 - Appropriate due diligence processes be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).

