



University of Essex



Modern Slavery and Human Trafficking Policy

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University Policy on Modern Slavery and Human Trafficking

Aim

The University of Essex is committed to protecting and respecting human rights. As such, the University takes a robust approach to ensuring that modern slavery or human trafficking is not happening as part of University operations or in the supply chain.

1. Introduction

- 1.1 Modern Slavery can take a number of forms including human trafficking, forced and bonded labour, and domestic servitude. The Modern Slavery Act 2015 requires that organisations with a turnover of £36M or more develop and demonstrate an awareness of supply chain risks which include services used by the University. This includes the provision of an annual statement on steps taken to address modern slavery in operations and supply chains. [The University also provides an annual statement on eradicating modern slavery in supply chains \(.pdf\)](#).

2. Scope and exclusions

- 2.1 The policy applies to all permanent and fixed-term employees at the University of Essex, regardless of length of service, during their employment with the University. This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

3. Roles and responsibilities

- Central Procurement Unit is responsible for taking all reasonable steps to ensure that there is no modern slavery or human trafficking in our supply chains, through procurement procedures and Financial Procedure Notes. The Unit is also responsible for producing an annual statement, as required under the Modern Slavery Act 2015.

People & Culture is responsible for ensuring that the University's employment policies are compliant with the Modern Slavery Act 2015 and that procedures are in place to ensure that statutory and other appropriate identity checks are made of all those who work for the University. The University People Supporting Strategy outlines our commitment to making all those who work for us aware of our policies and having a policy framework which responds to the workplace context but has a stronger focus on personal judgment and responsibility within the law. People & Culture are also responsible for ensuring that all employees (new and existing employees) have completed training on modern slavery within our wider How We Work at Essex essential training package.

- Heads of Departments and Sections are responsible for ensuring compliance with Financial Regulations within their department and that the requirements of these Regulations, along with the supplementary procedural guidance set out in Finance Procedure Notes, are drawn to the attention of individual budget holders.
- Budget Holders will ensure that the budgets and funds delegated to them and grants awarded to them are used in a way that complies with Financial Regulations, Financial Procedure Notes and Purchasing Regulations. This will ensure that appropriate checks are made and a full audit trail provided.

4. Policy statement

The University will take the following steps to address the risk of modern slavery:

- identify and address risk in our supply chains through the tender process, assessing the controls that our suppliers have in place to provide assurances that modern slavery is not present in the supply chain
- prevent modern slavery on our campuses, through ensuring that right to work checks are undertaken for anyone who works directly for the University
- take action if modern slavery cases are found, with a thorough investigation. If necessary, action will be taken through the disciplinary procedure including through terminating contracts if serious violations are found. In some situations, we may need to contact the relevant authorities (e.g. Police). We will listen to and protect whistle-blowers. Raise awareness of modern slavery across the University community

5. Reporting concerns or incidents

- 5.1 Any allegations of misconduct under this policy will be taken seriously.
- 5.2 Concerns or incidents may be raised with line managers or with Heads of Departments or Sections, who may then raise this with the Director of Finance or the Director of People & Culture.
- 5.3 Under the University's Whistleblowing Policy, an employee may also raise issues of significant concern directly with the Registrar and Secretary, as the designated person. If the employee does not wish to raise the matter with the Registrar and Secretary or with the Vice-Chancellor or the Chair of Council, it may be raised with the Treasurer (who is the Chair of Audit and Risk Management Committee).
- 5.4 If an employee has been affected by Modern Slavery and Human trafficking, we would encourage them to contact People & Culture and access additional support if required.

6. Equality impact assessment

- 6.1 The University has conducted an Equality Impact Assessment on this policy and is satisfied that its application should not result in a differential and negative impact on any groups of employees identified under the Equality Act 2010.

7. Monitoring

- 7.1 [People, Culture, and Inclusion Advisory Group](#) (.pdf) will monitor the impact of this policy.

8. Related university policies and procedures

- [Whistleblowing Policy](#)
- [Equality and Diversity Policy and Strategy](#)
- [Disciplinary Procedure](#)
- [Grievance Procedure](#)
- [Health and Safety Policy](#)
- [Zero Tolerance of Harassment and Bullying](#)
- [Essential Training Policy](#)
- [Academic Freedom and Freedom of Speech](#)

9. University sources of support and information

- [Health and Wellbeing](#)
- [Report and Support](#)
- [Mental Health First Aid](#)
- [Employee Assistance Programme](#)
- [University Financial Regulations](#)

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