Anti-Slavery and Human Trafficking Procedure			
This procedure sits under the Anti-Slavery and Human Trafficking Policy			
Brief Description & Purpose:	The purpose of this procedure is to provide detail on how to apply the Anti-Slavery and Human Trafficking Policy including when to refer to other related policies and procedures and how to report breaches of the policy.		
Applicable to (list cohorts):	**Staff:** *All staff, including Governors and co-opted Board Committee Members*	**Students:** *All students*	**Third Parties:** *All who are in a formal relationship with the University*
Effective From:	26 June 2023	**Last reviewed date:**	26 June 2023
Executive Owner:	Georgina Bailes	**Next review date:**	June 2026
Business Owner:	Richard Elliott	**Publication External Y/N**	Y
Contact for queries:	Richard Elliott		

1.   **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 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.

2.   **Raising Concerns about Modern Slavery**
        Anyone with a concern about modern slavery or human trafficking should speak to their line manager or academic tutor/supervisor in the first instance, or to their usual University contact if an employee of a third party working with the University.

        All concerns should also be communicated to the Head of Governance and Secretary to the Board, who will investigate in consultation with the relevant colleagues depending on the nature and location of the concern, and ensure that any required remedial action is taken. The concern and its resolution will also be included in the Annual Statement (see below); any suspected criminal activity will be reported to the relevant authorities.

        Alternatively, concerns can also be raised by following the Public Interest Disclosure (Whistleblowing) Policy and associated procedure. Individuals are encouraged to put their name to any concerns they raise, in the assurance that their identity will be protected as summarised in the Safeguards and Guarantees section of the Public Interest Disclosure policy. Anonymous concerns will nevertheless be reported, investigated and acted upon where necessary, although this may be more difficult without the ability to involve the discloser in the investigation.

3.   **Preparation and Publication of the Annual Statement**

        The annual statement is prepared by the Head of Governance and Secretary to the Board and Governance Manager in consultation with key Services and Teams across the University utilising the 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'*.

The annual statement is approved by Board of Governors prior to publication.

The statement covers the period of 1 August to 31 July and is published by 31 January on the University external website

4.   Related Procedures, Guidance 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)

5.   Version

Version No.	Reviewer	Date	Changes
1.0	Georgina Bailes Richard Elliott Paul Steadman	9 May 2023	*Original version*