

# Modern Slavery Policy

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## Introduction

### Anti-Slavery Declaration

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 have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
2. Northeastern University London (the University) has a zero-tolerance approach to modern slavery, and it is committed to acting ethically and with integrity in all activities and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place at the University or in any of its supply chains.
3. The University is also committed to ensuring there is transparency in our operations and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the [Modern Slavery Act 2015](#).
4. The University expects the same high standards from all of its contractors, suppliers and partners, and as part of our contracting processes, we will 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.

### Scope

5. This Policy applies to all persons employed by the University or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
6. This Policy does not form part of any employee's contract of employment and may be amended at any time.

### Responsibility for the Policy

7. The prevention, detection and reporting of modern slavery in any part of our activities or supply chains is the responsibility of all those employed by or on behalf of the University, and in any other capacity within the University's remit.

8. The University has overall responsibility for ensuring that this Policy complies with its legal obligations, and that all those within the University's remit comply with the expectations set out in this Policy.
9. The University has primary responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures.
10. Members and representatives of the University community are required to:
  - 10.1. Read, understand and comply with this Policy.
  - 10.2. Avoid any activity that might lead to, or suggest, a breach of this policy.
  - 10.3. Notify their line manager or a member of the Senior Management Team as soon as possible if they believe or suspect that a conflict with or breach of this Policy has occurred or may occur in the future.

## Communication and Awareness of this Policy

11. Training on this Policy, and on the risk the University faces from modern slavery in its supply chains, forms part of the induction process for all employees, and updates will be provided using established methods of internal communications.
12. This policy will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## Procedure for Reporting Concerns, Issues or Suspicions of Modern Slavery

13. Members and representatives of the University community 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.
14. If a member of the University community is uncertain 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, they should speak to their Line Manager or a member of the Senior Management Team.

15. The University aims 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.
16. The University is 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 activities or in any of our supply chains.
17. Members of the University community who believe that they have suffered any such detrimental treatment should inform their Line Manager immediately.

## Breaches of this Policy

18. Any employee who is found to be in breach of this Policy will face disciplinary action, which may result in dismissal for misconduct or gross misconduct. The University may terminate its relationship with other individuals and organisations working on its behalf if they breach this Policy.

## Monitoring and Reviewing

19. An annual summary of any breaches or concerns related to this Policy will be presented to Northeastern London Board of Governors.

## Version History

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