

Anti-slavery and anti-trafficking policy

1.Scope

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](#). The University also considers other related malpractice, including child labour, unsafe working conditions or excessive working hours, within this definition for the purposes of this policy.

The University is committed to ensuring that there is no modern slavery in our supply chains or any part of our business. The processes set out below reflect the University's commitment to acting ethically and with integrity across the organisation.

2.Application

This policy applies to all employees, workers, consultants, and other persons doing business with the University including all its wholly owned or controlled subsidiaries or majority joint ventures, its contractors, and its direct suppliers.

It does not apply to Oxford University Press, which has developed its own policies.

The prevention, detection, and reporting of modern slavery (and other related malpractice listed in the 'scope' section above) in any part of its business or supply chains is the responsibility of all those working for the University or under its control.

Appropriate HR and due diligence processes must be carried out in relation to modern slavery. This includes consideration of human rights practices 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).

Although the University as a higher education institution considers the risk of modern slavery to be comparatively low in its direct activities and supply chain, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures.

3.Key Controls

3.1 Procurement

The University procures goods and services from suppliers across the world, and has supporting systems in place to identify and assess potential risk areas and to mitigate the risk of slavery and human trafficking occurring in our supply chains.

3.2 Training

All members of the Purchasing Department receive training on supplier review templates and guidance. The University provides its managers with training and guidance on the recruitment process.

A short e-learning course, A Guide to Modern Slavery, is also available to provide all staff with an awareness of the topic and issues related to the Modern Slavery Act.

3.3 Communications and awareness raising

The University highlights modern slavery issues within its ongoing communications with Departments and with current trade suppliers, to maintain and increase awareness of the issue.

3.4 Raising concerns

The University encourages anyone to raise any concerns about modern slavery. This can be done directly to line management, to the compliance@admin.ox.ac.uk email address or via the [Public Interest Disclosure \(whistle-blowing\) code of practice](#), which aims to provide a transparent and confidential process for staff to disclose concerns about possible malpractices or improprieties. The University places the greatest importance on the integrity of its operations, and will support anyone who acts in good faith.

3.5 Recruitment, reward, equalities, wellbeing

The University is committed to ensuring that people are paid appropriately for the work that they carry out. Its policies on recruitment, reward, equalities, and wellbeing support its efforts to combat modern slavery and human trafficking.

3.6 Future commitments

The University will continue to develop its commitment to combat modern slavery and will outline such activities within its annual anti-slavery and anti-trafficking statement. This includes developing and improving its key performance indicators to help it better assess its effectiveness at identifying and managing risks related to modern slavery in its operations and supply chain.

3.7 Action in the event of a breach

Any breaches of this policy may result in the University taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

3.8 Anti-slavery and anti-trafficking statement

In accordance with Section 54 of the Modern Slavery Act 2015, the University is also required to prepare an anti-slavery and anti-trafficking statement for each financial year, setting out what steps it has taken to ensure that modern slavery is not taking place in its business or supply chains. [The University's statement](#) is published annually in line with government guidance and is available to view on the University website.

This policy is managed by the Personnel Committee and was last approved on 9 June 2022.