

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1 POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as Child labour, 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.

Definitions	
Child labour:	work that deprives children of their childhood, their potential and their dignity, and that is harmful to mental and physical development. Note that by international standards, child labour is defined as children below the age of 12 doing any work and children between 12 and 14 doing any more than light work and all children engaged in the worst forms of child labour (e.g. the use, procuring or offering a child for prostitution, sexual exploitation, or other illicit activities; the sale and trafficking of children).
Forced and compulsory labour:	where persons are coerced to work through the use of coercion (being either direct threats of violence or more subtle forms of compulsion). The key element is that work or service is exacted for any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.
Human Trafficking:	where a person arranges or facilitates the travel of another person with a view to that person being exploited. This may include where the victim has consented to the travel; for example, where the person has been deceived by the promise of a better life or job.
Servitude:	Servitude is the obligation to provide services that is imposed by the use of coercion.
Slavery:	the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. The key element of slavery is the behaviour on the part of the offender as if she or he owns the person, which deprives the victim of their freedom.

- 1.2 The University of Law Limited (“the **University**”) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 1.3 The University is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The University expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, the University includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the University expects that its suppliers will hold their own suppliers to the same high standards.

- 1.4 This policy applies to all persons working for the University or on the University's 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 (collectively referred to in this policy as 'Relevant Persons').
- 1.5 This policy does not form part of any employee's contract of employment and does not form any part of the terms and conditions of a student's enrolment. The University may amend this policy at any time.

2 RESPONSIBILITY FOR THE POLICY

- 2.1 The Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.1 The Head of Legal has primary and day-to-day responsibility for implementing this policy and dealing with any queries about it. The Chief People Officer ("CPO") is the Executive Team sponsor who has ultimate responsibility for ensuring the effectiveness of this policy.
- 2.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate briefing and support on it, and the issue of modern slavery in supply chains.
- 2.3 Relevant Persons, students and customers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Legal.

3 COMPLIANCE WITH THE POLICY

- 3.1 All Relevant Persons are expected to read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Staff must notify their manager, the Head of Legal or the CPO as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You 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.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager, Head of Legal or the CPO or report it under our Voicing Concern Policy as soon as possible. Where necessary, steps will be taken to contact the police. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 3.6 If you are unsure 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, raise it with your manager, the Head of Legal or the CPO.
- 3.7 We aim 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. We are 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 business or in any of our supply chains. Detrimental treatment includes dismissal,

disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager, the Head of Legal or the CPO immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the University's internet.

4 **COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 All Relevant Persons will be made aware of the requirements of this policy, and the risks our business faces from modern slavery in its supply chains.
- 4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5 **BREACHES OF THIS POLICY**

- 5.1 An investigation will be carried out in to any employee who is believed to have breached this policy. This may lead to disciplinary action. This could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6 **MODERN SLAVERY HELPLINE**

- 6.1 Whilst we encourage you to raise concerns regarding modern slavery at the University or within its supply chain as set out in this policy, you should also be aware there is a National Modern Slavery Helpline. This helpline allows anyone who thinks they may come across instances of modern slavery, or indeed may be a victim themselves, to call for more information and guidance on what to do next. The helpline number is 0800 0121 700.

VERSION	AMENDED BY	REVISION SUMMARY	DATE
V1.0	Legal	Initial drafting	19/08/2016
V1.1	EXECUTIVE BOARD	APPROVAL	14/09/2016
V1.2	EXECUTIVE BOARD	Approval	06/06/2018
V1.3	Legal	Review and Update	02/07/2020
V1.4	EXECUTIVE BOARD	Approval	06/09/2022