

Modern Slavery Policy

This Policy relates to the University's position and approach to tackling Modern Slavery and complying with the legal requirements introduced by the Modern Slavery Act 2015.

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1. Scope and Purpose

- 1.1 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. Teesside University has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other 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.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 In support of this Policy the University will produce an annual Modern Slavery and Human Trafficking Statement setting out the steps we have taken, and are planning to take, to ensure there is no slavery in our business and supply chains. This statement will be approved by the Board of Governors and signed by the Chair or in their absence another member of the Board.

2. Responsibility for this Policy

- 2.1 The University Executive Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under the University's control comply with it.
- 2.2 The Director of Finance & Commercial Development has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 The Head of Procurement has day-to-day responsibility for implementing this policy in respect of the University's supply chains, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.4 The Executive Director of Human Resources has responsibility for ensuring that the University's employment policies are compliant with the Modern Slavery Act 2015.
- 2.5 Deans and Directors are responsible for ensuring those reporting to them understand and comply with this policy.

3. Compliance – Reporting Concerns

- 3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for the University or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager, who should in turn notify the Director of Finance & Commercial Development, as soon as possible, if you believe or suspect that a breach or conflict with this policy has occurred, or may occur in the future.
- 3.2 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 the University or in any of our supply chain.
- 3.3 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 chain constitutes any of the various forms of modern slavery, raise it with your manager or with the Head of Procurement. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chain.
- 3.5 The University's Public Interest Disclosure Policy (Whistleblowing) also permits staff, students and anyone contractually associated with the University to raise concerns of serious malpractice in the University. Deans and Directors or their representative must report any suspected breaches of the Modern Slavery Act to the University Secretary.
- 3.6 Any allegations of misconduct under this Policy within the jurisdiction of the University will be taken seriously. Should any member of the University be found to have acted in contravention of this Policy or the related UK legislation, action will be taken under the University's Disciplinary Procedures. Breaches or attempted breaches of the policy may be considered an act of gross misconduct and, where it is considered that a criminal offence has occurred, the police may be informed.

4. Communication and awareness

- 4.1 Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 4.2 We provide access to specialist training to those staff members who are involved in procurement and managing recruitment.
- 4.3 This Policy and the University's Modern Slavery and Human Trafficking Statement will be communicated to all staff.

5. Breaches of this policy

- 5.1 Any employee who breaches this policy may be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.