

Anti-Slavery and Human Trafficking Policy – Ref: 308P

Responsibility for Policy:	Finance Director
Relevant to:	All LJMU Staff and other workers
Approved by:	ELT and by Board of Governors on an annual basis
Responsibility for Document Review:	Finance Director
Date introduced:	November 2017
Date(s) modified:	Reviewed October 2018 and October 2019, October 2020, October 2021
Next Review Date:	October 2022

RELEVANT DOCUMENTS

- Modern Slavery Act 2015

RELATED POLICIES & DOCUMENTS

- Staff Code of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- Procurement Strategy
- Financial Regulations
- Risk Management Policy
- Financial Due Diligence Process

1. Statement by the Office of the Vice-Chancellor

- 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.
- 1.2 Liverpool John Moores University strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain 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 business and/or supply chains.
- 1.3 The University is 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.
- 1.4 The University expects the same high standards from all its contractors, suppliers and other business partners, and as part of its contracting processes, specific prohibitions are included against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The University expects that its suppliers will hold their own suppliers to the same high standards.
- 1.5 This policy applies to all persons working for the University or on its behalf in any capacity, including employees at all levels, governors, directors, officers, agency workers, seconded workers, volunteers, suppliers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.6 This policy must be read alongside and in conjunction with the University's other policies including but not limited to its Sustainable Procurement Policy, Financial Regulations, Whistleblowing Policy, Staff Code of Conduct and Disciplinary Policy.
- 1.7 This policy does not form part of any employee's contract of employment and may be amended by the University at any time.
- 1.8 Agents, consultants and business partners who work with or on behalf of the University must act with integrity and behave ethically. The

University will terminate agreements with such agents, consultants and business partners in the event of any breach of this policy or unethical behaviour.

- 1.9 The University has made a commitment to paying Living Wage to all staff within its core operations.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Board of Governors has overall responsibility for ensuring this policy complies with the University's legal and ethical obligations, and that all those under the University's control comply with it.
- 2.2 The Director of Finance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and that awareness is raised of modern slavery in supply chains via the University's training modules.
- 2.4 Members of the Executive Leadership Team are required to declare and certify compliance with this policy within their own areas of responsibility on an annual basis.

3. COMPLIANCE WITH THE POLICY

- 3.1 All those working for the University or under its control must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of the University's business or supply chains is the responsibility of all those working for the University or under the University's control. All of those within the scope of this policy are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 Appropriate due diligence processes as detailed in the Financial Due Diligence policy must be carried out in relation to modern slavery which may include considering human rights 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

complexities of supply chains. All staff are required to cooperate with due diligence processes fully.

- 3.4 Overseen by the Finance Director; all supply chains need to be continually risk assessed and managed in relation to modern slavery and the University has embedded a risk assessment and management process, and any high-risk suppliers are reviewed in detail.
- 3.5 The University encourages the raising of concerns about any issue or suspicion of modern slavery in any part of the University's business or supply chains or any supplier tier at the earliest possible stage. The University will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 3.6 If a breach of this policy is believed or suspected to have occurred, or that it may occur, it is the responsibility of the individual to notify the Finance Director, or report it in accordance with the University's Whistleblowing Policy, without delay. If there is any doubt about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the University's supply chains constitutes any of the various forms of modern slavery, this can be raised with the Finance Director.
- 3.7 Where appropriate, and with the welfare and safety of local workers as a priority, the University will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 4.2 The University's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.
- 4.3 Wherever possible, all of the University's contracts with third party suppliers will include specific reference to that provider's compliance with the Modern Slavery Act and the University will obtain warranties from suppliers that they are free of modern slavery.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary action, up to and including dismissal.
- 5.2 The University may terminate its relationship with other individuals and organisations if they breach this policy.

6. MONITORING AND REVIEW

- 6.1 The Policy Lead will action a review of this policy statement and related policies on an annual basis. Any changes needed to ensure effectiveness will be drawn to the attention of the Audit & Risk Committee of the Board of Governors and the Board itself.
- 6.2 The Director of Finance reserves the right to amend this document at any time should the need arise.

7. KEY CONTACTS

- 7.1 Policy Owners – The Board of Governors of the University.
Policy Lead – Finance Director.
First point of contact for reporting suspected breaches – Finance Director, University Secretary & General Counsel.