



Anti-slavery and Human Trafficking Policy

Introduction

Cranfield University recognises that slavery and human trafficking remains a hidden blight on our global society and as such is committed to excluding all acts of modern day slavery within its business and that from within its supply chains, including sub-contractors and partners. Modern slavery is a crime, and abuse of fundamental human rights. It takes different forms including, but not limited to, slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the withholding of a person's liberty by another so to exploit them for personal and commercial gain.

Cranfield University acknowledges its responsibility to the Modern Slavery Act 2015 ("the Act") and is committed to ensuring that there is transparency within its organisation and that of the suppliers of goods and services to it. Cranfield University has a zero tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in its business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery and human trafficking does not take place anywhere within its business and expects the same high standards from all of its contractors, suppliers and other business partners.

Scope of Policy

This policy applies to all persons working for Cranfield University and 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.

Responsibilities

Cranfield University Executive has overall responsibility for ensuring this policy complies with all legal and ethical obligations and that all those under its control comply with it fully.

Cranfield University's Internal Audit function will monitor the use and effectiveness of the policy.

Management at all levels within Cranfield University are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the policy and the issue of modern slavery and human trafficking in supply chains.

All Cranfield University staff and those working for Cranfield University in any capacity must read, understand and comply with this policy.

Cranfield University zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

The Human Resources Director and Director of Finance are responsible for ensuring that the awareness of modern slavery and human trafficking risks are communicated throughout Cranfield University and its supply chains.

Compliance with the policy

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.

You must notify Cranfield University's Chief Operating Officer and Internal Audit as soon as possible if:

- you believe or suspect that a conflict with this policy has occurred, or may occur in the future;
- or
- you believe or suspect a breach of this policy has occurred or may occur.

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 OR the Procurement Manager.

Raising Awareness of Modern Slavery and Human Trafficking

Cranfield University will, as well as educating and training its staff on matters of modern slavery and human trafficking, raise awareness of modern slavery matters through provision of information on its internet site, such will include a copy of its Modern Slavery and Human Trafficking Statement on the internet. Details of the Modern Slavery Act 2015 and associated issues will be published on Cranfield University's intranet including basic principles of "the Act".

Breaches of Policy

The Cranfield University Chief Operating Officer is responsible for conducting investigations and due diligence into known or suspected instances of slavery and human trafficking.

Any Cranfield University employee who breaches this policy will face disciplinary action, which may result in dismissal for misconduct or gross misconduct.

Cranfield University may terminate its relationship with other individuals and/or organisations working on its behalf if they breach this policy.

Associated Policies

[Employee Code of Conduct Policy](#): [Ethical principles \(cranfield.ac.uk\)](#)

Policies, regulations and information compliance

[Anti-Bribery Policy](#)

[Whistleblowing Policy and procedure](#)

[Counter-Fraud Policy](#)

[Procurement policy and Terms and Conditions of Purchase](#)

Document Control

Document title	Anti-slavery and Human Trafficking Policy
Originator name/document owner	Director of Finance
Professional Service Unit/Department	Finance
Implementation/effective date	April 2024
Approval by and date	Executive 30 April 2024
Date of last review and version number	October 2020 v2
Date of next review	March 2028

Annex 1

•

Title/Role	Name	Phone	E-mail
Chief Operating Officer	Philip Aspinall	01234 754001	Jo.Hampshire@cranfield.ac.uk
Internal Audit	Sitha Khanam		Sitha.Khanam@cranfield.ac.uk