

Modern Slavery Policy

Title:	Modern Slavery Policy
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Document control

- 1. Superseded documents:**
MF-POL-057 issue 1, dated 16/03/20
- 2. Changes made**
Changes to terminology.
- 3. Changes forecast**
none.

Summary

This document is split into the following sections:

- 1. Policy** – the reason we have this guidance and why it's necessary.
- 2. Process** –the process for individuals using this policy, including information and guidance on how to report a concern.

Non-sensitive

This document becomes UNCONTROLLED if printed or when held in any other location other than the QMS or ISMS

1. Purpose

The purpose of this policy is to describe the commitment of Jisc to help eradicate modern slavery and human trafficking wherever it exists. Our annual statement will provide information to supplement this policy, including details of our activities, supply chains and the actions we are taking to support the eradication of modern slavery and human trafficking.

2. Scope

This policy applies to all individuals working for Jisc or any Jisc Group Company in any capacity. It also applies to trustees and members of board committees.

The board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all staff, trustees and committee members comply with it.

3. Our commitment

Jisc adopts a zero-tolerance approach to modern slavery, human trafficking and any form of bribery and corruption, directly and indirectly, associated with these criminal acts. We are committed to acting ethically in all our business dealings and relationships, and to implementing and enforcing effective processes and controls to ensure modern slavery is not taking place in our business or in any of our supply chains. We fully support the eradication of modern slavery and human trafficking.

We take our responsibilities to combat modern slavery in our supply chain seriously:

- Appropriate due diligence is performed on suppliers, which is informed by the nature of a procurement and the goods/services to be delivered.
- We are an affiliate member of Electronics Watch, a monitoring organisation, which audits the supply chain of technology components and protects workers rights
- Our standard contracts require suppliers to warrant that all times during the term of the contract they, their subcontractors and suppliers, comply with Modern Slavery Legislation and in line with Jisc's approach as outlined in our annual statement. We require suppliers to notify Jisc as soon as they become aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with the contract.

Procurement staff receive regular training on modern slavery issues.

The prevention, detection, and reporting of modern slavery in any part of our business and supply chains is the responsibility of all of us working across the organisation:

- We expect everyone to raise any concerns about modern slavery, through their manager or using our whistleblowing policy if necessary and will support anyone who reports concerns in good faith.
- A range of staff policies are in place to ensure that we act upon our commitment to eradicate modern slavery and human trafficking, including responsible recruitment, dignity at work and a pay framework. We are an accredited Living Wage employer.

We will not work with any suppliers that do not reach the standards required through our due diligence or audit processes.

Any indication of a failure to meet required standards either before or during the life of a contract will be reported to the necessary authorities (e.g. <https://www.modernslaveryhelpline.org/>, or the police if immediate danger is perceived).

4. Communications and training

This policy will be shared with all staff and included in the list of policies that new starters are expected to read and accept.

A training module on Modern Slavery is available for all staff in **Fuse**, our learning and development platform.

5. Contact and further information

The responsibility for monitoring this policy rests with the Governance team. The policy will be reviewed annually and updated when Jisc deem it necessary or when legislation changes.

Questions and disclosures should be sent to the Governance team (governance@jisc.ac.uk) or the Deputy company secretary (joanna.potter@jisc.ac.uk).

6. Related policies and guidance

- Anti-bribery and corruption policy
- Dignity at work policy
- Equality, diversity and inclusion policy
- Pay and reward policy
- Annual leave policy
- Health safety and wellbeing policy
- Whistleblowing policy
- Procurement processes

Appendix 1: Process and Responsibilities

How to report a concern

Any indication of a failure to meet required standards either before or during the life of a contract should be raised with the Governance team (governance@jisc.ac.uk) and will be reported to the necessary authorities (e.g. <https://www.modernslaveryhelpline.org/>).

If immediate danger is perceived, individuals should contact the police directly and advise the Governance team that they have done so.

Responsibilities

The Governance team are responsible for:

1. Explaining the Modern Slavery policy and taking steps to positively promote it;
2. Providing support and guidance to individuals and line managers;
3. Being responsive and supportive to any individual who seeks guidance;
4. Ensuring that training is available to all staff and all staff have access to this policy and related processes;
5. Encouraging employees to be vigilant and to report any concern as outlined above;
6. Maintaining confidentiality in all cases;
7. Seeking advice from the Deputy chief executive as necessary;
8. Monitoring and updating this policy as necessary.

Individuals are responsible for:

1. Ensuring that they read, understand and comply with this policy;
2. Being vigilant and reporting any concerns as outlined above.

Line managers are responsible for:

1. Raising awareness of this policy.

The HR team are responsible for:

1. Raising awareness of this policy to new starters at the time of corporate or individual induction.