



Policy name	Modern Slavery
Subject	The University's response to its obligations under the Modern Slavery Act 2015
Approving authority	UEB
Accountable person	Chief Financial Officer
Responsible Team	Procurement
First approved	2015
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1 Introductory Purpose & Background

The Modern Slavery Act 2015 (Act) introduced into UK law a range of measures aimed at combating crimes of slavery and human trafficking. Importantly, section 54 of the Act, dedicated to transparency in supply chains, requires large organisations meeting certain criteria to produce an annual slavery and human trafficking statement, approved by its governing board, and published appropriately.

The University is committed to acting ethically, with integrity 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. The University is guided in this process by its 38-step Slavery-Free Campus Blueprint, consistent with its disclosure obligations under the Modern Slavery Act 2015.

2 Scope

This policy applies to all persons working for the University of Nottingham UK or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and the University may amend it at any time.

3 Definitions

The UK government explains that modern slavery “refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power, and is “a crime resulting in an abhorrent abuse of human rights... constituted in the Modern Slavery Act 2015 by the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’”.

Forced labour is the most common form of modern slavery. This is defined internationally as “all work or service which is exacted from any person under the

threat of a penalty and for which the person has not offered himself or herself voluntarily”.

Human trafficking is defined in [international law](#) as “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation.”

The UK government has identified and collects data on potential victims of modern slavery in four main categories: labour exploitation, domestic servitude, sexual exploitation and criminal exploitation.

All forms of modern slavery and human trafficking are a violation of human rights.

4 Policy

4.1 Key principles

4.1.1 The University has a zero-tolerance approach to modern slavery and is committed to acting ethically and with controls to take steps to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

4.2 Key roles, responsibilities and/or requirements

4.2.1 The Chief Financial Officer (CFO)

is the compliance officer under this policy and has primary and day-to-day responsibility for implementing the policy, monitoring its use and effectiveness and dealing with any queries about it.

4.2.2 The Chair of the Modern Slavery Act Working Group

is responsible for communicating the requirements of the Modern Slavery Act 2015 to the University community and for overseeing the implementation of the University's plans and commitments as set out in its annual Modern Slavery Statement.

4.2.3 The Head of Procurement

has day-to-day responsibility for implementing this policy specifically in respect of the University's supply chains, monitoring its use and effectiveness, dealing with any queries about it, reviewing internal control systems and procedures to ensure they are effective, and communicating the University's Modern Slavery Policy to suppliers.

4.2.4 Faculty Pro-Vice Chancellors and Directors of Professional Service Departments

are accountable for compliance with this policy, the University's financial regulations and procurement policies and all procedures within their faculty or department.

4.2.5 Line Managers

at all levels are responsible for ensuring those reporting to them are made aware of this policy and complete relevant training.

4.2.6 All Staff

must ensure that they read, understand and comply with this policy and complete the mandatory online training course.

The prevention, detection and reporting of modern slavery in any part of University business or supply chains is the responsibility of all those working for the University or under its control. Staff are required to avoid any activity that might constitute or lead to a breach of this policy.

Staff should not confront anyone they have concerns about or their potential exploiters.

If a staff member suspects modern slavery, they should raise their concerns via [Report and Support](#). This can be done anonymously. Outside of work, staff can call the Modern Slavery helpline on 08000 121 700 or via the [online helpline function](#). The police should be contacted on 999 if someone is in immediate danger and at risk of harm.

4.2.7 Supply Chain Partners

are expected to adhere to the University's Supplier Code of Conduct, which explicitly prohibits modern slavery and related practices. They are required to conduct their operations in a manner consistent with the University's ethical standards.

4.3 Component elements/specifics

In accordance with Section 54 of the Modern Slavery Act 2015, the University will publish an annual Modern Slavery Act 2015 Statement. The annual statement will outline how the university's structures, processes, recent actions and future plans prevent and mitigate modern slavery.

The University expects the same high standards from all of its contractors, suppliers and other business partners. Wherever practicable, the University will seek to include in its contracts specific obligations to comply with applicable anti-slavery and human trafficking laws, including the Modern Slavery Act 2015. The University requires that its suppliers comply with the same applicable laws and expects that they will apply the same high standards with its own suppliers.

4.4 The consequences of non-compliance

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

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

4.5 How compliance with the policy will be measured

An annual assessment is run on the University's procurement spend to understand the distribution of risk in the University supply chain and to inform where there is a need for focussed due diligence as part of the University Modern Slavery Procurement risk tool.

The University explores activities that suppliers are undertaking in the detection and prevention of modern slavery within tendered supply chains.

4.6 Provisions for monitoring and reporting related to the policy

The University has a 38-step plan ("Blueprint") in place to guide its annual approach to tackling and preventing modern slavery and its vision of becoming a slavery-free campus. It has adopted a five-point scale for maturity level against each step and set targets over multiple years to measure progress.

An active Modern Slavery Act Working Group ensures that the University's annual commitments on this topic are regularly updated, monitored and reported. The Group meets throughout the year to review progress and agree priorities for the next period. The Group includes senior representatives from key university functions including a senior representative from the Students' Union.

The University will monitor Report and Support cases for any potential modern slavery concerns.

The "Modern Slavery Act 2015: Annual Statement" is submitted to University Council for its approval, prior to publication.

5 [Review](#)

This policy will be reviewed every two years as a minimum.

6 [Related Policies, Procedures, Standards and Guidance](#)

Please refer to the following which can be accessed from the [University Policy Finder](#):

- Modern Slavery Annual Statement
- Ethical Framework
- Procurement Policy

