

Modern Slavery & Human Trafficking Policy	
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Owner	Head of Governance
Author	Alexandra Wall and Michelle Wickenden
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VERSION CONTROL				
Version Number	Status	Revision Date	Author(s)	Summary of Changes
0.1	Draft	18 October 2017	Alexandra Wall, Michelle Wickenden, Cathy Hargreaves	Creation of Policy Document
0.2	Draft		Michelle Wickenden	Updated following feedback from GRAIN members and UKSBS
0.3	Draft	12 June 2018	John Sullivan	Updated following GARI review meeting [minor amendments]
0.4	Draft	19 th December 2019	Alexandra Wall	UKRI Branding

DISTRIBUTION FOR REVIEW			
Name	Title	Approved	Date
Sue Bennett	MSA working group	Y	17 Nov 2017
Kenna Bishop	MSA working group	Y	17 Nov 2017
Toni-Jo Henderson	MSA working group	Y	17 Nov 2017
Cathy Hargreaves	MSA working group	Y	17 Nov 2017
Carole Walker	Chair of GRAIN	Y	11 Dec 2017
	T&C Trade Union Working Group	Y	9 Feb 2018
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Grazka Kazmierska	Interim Deputy Director, GARI	Y	19 July 2018

PUBLICATIONS		
Location	Audience	Link
UKRI Intranet	UKRI Staff	TBC
UKRI Website	General public, prospective employees, academic bodies	TBC



UKRI Anti-Modern Slavery and Human Trafficking Policy

Anti-Modern Slavery & Human Trafficking Policy statement

UK Research and Innovation (UKRI) fully understands its obligations to the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking in all its activities, whether conducted by its staff or otherwise. We will work to ensure our internal processes and external supply chains are free from slavery and human trafficking.

UKRI is committed to the government's objectives to eradicate modern slavery and human trafficking. If it is identified in the supply chain, UKRI will work with partners and suppliers to investigate and address it.

UKRI's annual MSA statement will provide information to supplement this policy, including details of its activities, supply chains and actions it is taking to adhere to the Modern Slavery Act 2015.

1. Policy Scope

- 1.1 This policy applies to all UKRI employees, whether permanent, temporary, full-time or part-time, contractors, consultants, secondees, Board and Committee members (including Non-Executive Directors, hereafter referred to as 'staff') and will be brought to their attention. The policy is especially relevant to staff involved in the following area:
 - Recruitment
 - Risk and assurance
 - Procurement and major projects
 - Funding
 - Funding assurance
 - Supply chain management
- 1.2 Any member of staff who breaches this policy will be dealt with under the UKRI Disciplinary Policy: <https://www.ukri.org/files/termsconditions/rcukukriterms/disciplinary-pdf/>
- 1.3 We may terminate our relationship with individuals and organisations working on our behalf if they breach this policy.
- 1.4 The Modern Slavery Act 2015 details the penalties for those found guilty of an offence under Section 1 or 2 of the Act which could be up to imprisonment for life. A copy of the Modern Slavery Act 2015 is available at <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>. A list of related documents is available at Appendix 1.

2 Principles and Objectives

- 2.1 UKRI is committed to the implementation and promotion of ethical business practices to protect staff from being abused and exploited and expect the same high standards from its contractors, suppliers and other business partners. As part of UKRI's contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and UKRI requires that suppliers hold their own suppliers to the same high standards.
- 2.2 The purpose of this policy is to:
- Ensure staff are aware of the requirements placed on them, supplier, contractors and business partners regarding combating modern slavery and human trafficking.
 - Provide staff with the opportunity and protection they need to raise concerns internally. UKRI expects that in almost all cases, raising concerns internally would be the most appropriate action to take.
- 2.3 The objectives of this policy are to
- Raise awareness of the Modern Slavery Act 2015
 - Clearly communicate the high-level requirements on staff, suppliers, contractors and business partners
 - Ensure that there is transparency in UKRI's operations and in its approach to tackling modern slavery and human trafficking throughout its business and supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015.
- 2.4 The purpose of implementing this policy is to prevent slavery and human trafficking in all UKRI activities and to ensure that its supply chains are free from slavery and human trafficking.

3 Policy Content

Definition

- 3.1 Modern slavery 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.
- 3.2 Someone is in slavery if they are:
- forced to work through mental or physical threat
 - owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
 - dehumanised, treated as a commodity or bought and sold as 'property'
 - physically constrained or have restrictions placed on his/her freedom

- 3.3 The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015. These are:
- 'slavery' is where ownership is exercised over a person
 - 'servitude' involves the obligation to provide services imposed by coercion
 - 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
 - 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.
- 3.4 The supply chain¹ refers to the entire network of entities, directly or indirectly interlinked and interdependent in serving UKRI in the UK and any other country within which UKRI operates. It includes (but is not restricted to):
- Higher Education Institutes (HEIs)
 - Research Organisations
 - Catapults
 - Knowledge Transfer Networks
 - Third party suppliers

Standards

- 3.5 Basic rights that all staff are entitled to include:
- The right to a reasonable wage
 - The right to a safe working environment
 - The right to an appropriate level of holiday and cover for period of sickness.
 - The freedom to complain directly via the Whistleblowing Policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Corporate and Organisational Responsibilities

- 3.6 The UKRI Board is accountable for ensuring this policy complies with our legal and ethical obligations, and that all staff comply with it.
- 3.7 The Head of Governance is responsible for ensuring:
- The Anti-Slavery and Human Trafficking policy and the annual modern slavery and human trafficking statement is compliant with the Modern Slavery Act 2015.
 - The annual statement is produced, approved and published within the correct timescales on the UKRI website.
 - Reporting and establishing remedial procedures to address any suspected breaches of the Modern Slavery Act or this policy both internally and externally.

¹ Transparency in Supply Chains etc. A practical guide:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf

- 3.8 The Modern Slavery Act Advisor has primary and day-to-day responsibility for implementing this policy, developing appropriate risk management and contract / Terms and Conditions guidance, monitoring its use and effectiveness, dealing with any relevant queries, and auditing internal control systems and procedures to ensure they are effective in counteracting modern slavery.
- 3.9 Wherever possible, UKRI (working with UK SBS where relevant) will obtain guarantees from suppliers, contractors and business partners that they have policies, procedures and mechanisms in place to combat modern slavery (which can be passed on to subcontractors).
- 3.10 Line managers are responsible for ensuring those reporting to them understand and comply with this policy.
- 3.11 Training on this policy and on the risk UKRI faces from modern slavery in its business activities and supply chains, forms part of the induction process for all individuals who work for UKRI. A Training Strategy will require all key staff to complete the e-learning awareness training, though all staff will be encouraged to do so, with specialist training where appropriate. The UKRI Governance, Assurance, Risk and Information Sharepoint site will include a Modern Slavery and Human Trafficking toolkit with useful resources, checklists and links.

Individual Responsibilities of Staff

- 3.12 Where reasonable and appropriate, staff must advise UK suppliers, contractors and business partners that UKRI require them to adhere to the Modern Slavery Act 2015. The UKSBS will manage this on behalf of UKRI with regards to the procurement processes it is responsible for. UK suppliers and overseas organisations that carry on business within the UK that fall within the scope of the act² will need to provide evidence, such as their annual Modern Slavery and Human Trafficking Statement, that this is the case. Regarding overseas suppliers and partners that do not fall within the scope of the Act, staff must advise them that they are required to act within the spirit of the Modern Slavery Act 2015 and raise awareness of modern slavery and human trafficking with their own suppliers and contractors. The precise requirements and compliance procedures will be included in contracts, Terms and Conditions and other relevant agreements.
- 3.13 If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our business or supply chains constitutes any of the various forms of modern slavery, they must raise it with the Head of Governance.

² According to the Modern Slavery Act 2015, an organisation must comply with section 54 of the Modern Slavery Act 2015 if they:

- are a body corporate (wherever incorporated) or a partnership;
- carry on a business, or part of a business, in the UK;
- supply goods or services; and
- have an annual turnover of £36m or more.

Risk Assessment

- 3.14 UKRI has introduced a programme of ongoing assessments regarding areas of high-risk in its business and supply chains. Internal processes and procedures allow UKRI to clearly identify high-risk business activity and areas within our supply chains where there is an increased risk of modern slavery.
- 3.15 The risk assessment, prevention, detection and reporting of modern slavery in any part of UKRI's business or supply chains is the responsibility of all those working for and with UKRI. Staff, suppliers, contractors and business partners are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.16 Staff are required to carry-out appropriate risk assessment and due diligence processes within their areas of responsibility in relation to modern slavery. This may include consideration of human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services or goods are provided, the nature of relationships with suppliers, and the complexity of supply chain(s). The risks will be captured and reported in line with the UKRI Risk Management Policy.
- 3.17 All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited. UK SBS supplier contract terms and conditions require suppliers to provide periodic self-assurance reports on actions taken to embed the principles of the Modern Slavery Act 2015 in their activities and supply chains. For Purchase orders and smaller procurement arrangements, the supplier is contractually required to comply with all relevant legislation including the Modern Slavery Act 2015. The UK SBS contractual controls are explained more fully in their Modern Slavery and Human Trafficking Statement.

Procedure for raising concerns under this policy

- 3.18 Staff must raise concerns about any issue or suspicion of modern slavery in any part of UKRI's business or supply chains at the earliest possible stage.
- 3.19 If a member of staff believes or suspects a breach of this policy has occurred internally within UKRI or that it may occur, they must notify the Head of Governance, or report it via the UKRI Whistleblowing Policy or the dedicated Modern Slavery Act email (modernslaveryact@ukri.org) as soon as possible.
- 3.20 If a member of staff believes or suspects a breach of the Modern Slavery Act by a third party, this should be raised through the risk management process and must be reported to the Head of Governance or via the dedicated [Modern Slavery Act email](#).
- 3.21 If a third party believes or suspects a breach of the Modern Slavery Act in UKRI related activity, this must be raised with the Head of Governance or via the [Modern Slavery Act email](#).
- 3.22 Any breaches of this policy may result in UKRI taking disciplinary action against individual(s) (internally) as determined by the UKRI Disciplinary Policy or terminating its relationship with third parties if steps are not taken to address the breaches.
- 3.23 UKRI aims 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. UKRI is committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery in any form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Head of Governance immediately. If the matter is not remedied, and you are a member of staff, you should raise it formally with your line manager or HR team using our Grievance Procedure:
<https://www.ukri.org/files/termsconditions/rcukukriterms/grievance-pdf/>

4 Effective date

- 5.1 This policy is effective from 23 July 2018.

5 Review date

- 5.1 This policy will be formally reviewed in July 2019 or as and when required. It must be reviewed on an annual basis.
- 5.2 This policy will be regularly reviewed with Trade Union consultation. Trade Unions may additionally request that the policy be reviewed.
- 5.3 The Deputy Director Governance, Assurance, Risk and Information (GARI) is responsible for signing-off this policy.

Appendix 1: Relevant authoritative bodies and related documents

Authoritative Bodies

Title of Body	Description / relevance
Home Office	Modern Slavery Act 2015
Department of Business Innovation and Skills (BIS)	Supports the research and innovation community and funds UKRI research.

Related Documents

Document Title	Description / relevance
Modern Slavery and Human Trafficking annual statement	AHRC: https://ahrc.ukri.org/about/policies/modern-slavery-statement/ BBSRC: https://bbsrc.ukri.org/about/policies-standards/modern-slavery-human-trafficking-statement/ ESRC: https://esrc.ukri.org/about-us/policies-and-standards/modern-slavery-and-human-trafficking-statement/ Innovate UK: https://www.gov.uk/government/publications/innovate-uk-slavery-and-human-trafficking-statement-2016-to-2017 MRC: https://mrc.ukri.org/about/information-standards/mrc-modern-slavery-trafficking-statement/ NERC: https://nerc.ukri.org/about/policy/policies/slavery/ STFC: https://stfc.ukri.org/about-us/how-we-are-governed/policies-standards/modern-slavery-act-2015/ UK SBS: https://www.uksbs.co.uk/pages/default.aspx
Staff Code of Conduct	https://www.ukri.org/files/termsconditions/rcukukriterms/code-of-conduct-pdf/
Whistleblowing policy	https://www.ukri.org/files/termsconditions/rcukukriterms/whistleblowing-pdf/
Disciplinary policy	https://www.ukri.org/files/termsconditions/rcukukriterms/disciplinary-pdf/
Recruitment policy	https://www.ukri.org/files/termsconditions/rcukukriterms/recruitment-and-selection-pdf/
Grievance Policy	https://www.ukri.org/files/termsconditions/rcukukriterms/grievance-pdf/