



## 1 Purpose

- 1.1 The purpose of this procedure is to ensure adherence to the Modern Slavery Act 2015 and prevent slavery and human trafficking in all UKCEH activities and to ensure that its supply chains are free from slavery and human trafficking. It seeks to ensure that employees are aware of the requirements placed on them, suppliers, contractors and business partners regarding combating modern slavery and human trafficking. It also seeks to provide employees with the opportunity and protection they need to raise concerns.

## 2 Scope

- 2.1 For the purposes of this procedure, the use of the term “UKCEH people” covers UKCEH employees on permanent (open ended) or fixed and short term contracts, as well as persons who are on secondment to the CEH and non-employees such as students, fellows, contractors and other persons carrying out work on CEH premises, and/or on behalf of CEH.

## 3 Procedure Statement

- 3.1 Modern slavery takes various forms, including 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. 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.
- 3.1.2 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.
- 3.1.3 The supply chain refers to the entire network of entities, directly or indirectly interlinked and interdependent in serving UKCEH in the UK and any other country within which UKCEH operates.
- 3.1.4 The Modern Slavery Act 2015 details the penalties for those found guilty of an offence under Section 1 or 2 of the Act and include imprisonment for life.
- 3.1.5 UKCEH is committed to the implementation and promotion of ethical business practices to protect UKCEH people from being abused and exploited and expect the same high standards from its contractors, suppliers and other business partners. UKCEH understands its obligations under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking in all its activities, whether conducted by its staff or throughout its supply chain.
- 3.1.6 The contracting process will include specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and



UKCEH will work to ensure that our suppliers hold their own suppliers to the same high standards.

- 3.1.7 Those employees in relevant roles must advise UK suppliers, contractors and business partners that UKCEH requires them to adhere to the Modern Slavery Act 2015. UK suppliers and overseas organisations that carry out business within the UK that fall within the scope of the act, will need to provide evidence, such as their annual Modern Slavery and Human Trafficking Statement, that this is the case.
- 3.1.8 When dealing with overseas suppliers and partners that do not fall within the scope of the Act, employees 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.
- 3.1.9 Those employees involved in such processes (3.1.7 and 3.1.8) are expected to be aware of and reinforce the relevant legislation as well as to report any concerns. However, the overarching responsibility sits primarily with the due diligence process and contractual arrangements.
- 3.1.9 We may terminate our relationship with individuals and organisations working on our behalf if they breach this procedure. We may also inform the police.
- 3.1.10 We will work to ensure our internal processes and external supply chains are free from slavery and human trafficking. Where any concern is raised we will investigate and address it.

## **3.2 Roles and Responsibilities**

- 3.2.1 The UKCEH Board is accountable for ensuring UKCEH complies with the relevant legal and ethical obligations.
- 3.2.2 The Director of People & Operations is responsible for ensuring:
- The Modern Slavery Policy remains up to date and relevant to UKCEH.
  - 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 UKCEH website.
  - Overseeing the reporting process and establishing remedial procedures to address any suspected breaches of the Modern Slavery Act or this procedure.
  - Overseeing contracting and procurement activities to ensure compliance with this procedure.
  - Overseeing internal audit and compliance activity to ensure compliance with this procedure.
- 3.2.3 The Project Manager is responsible for ensuring that project risk assessments include consideration of modern slavery risks in working with project partners and suppliers.
- 3.2.4 The Annual Modern Slavery Statement should include the following:
- CEH's structure, business and supply chains;



- note of policies in relation to slavery and human trafficking;
- due diligence processes;
- the parts of the business and supply chains at risk and steps taken to manage risks;
- effectiveness in ensuring that slavery and human trafficking is not taking place; and
- training available to staff.

3.2.5 Line managers are responsible for ensuring those reporting to them understand and comply with this procedure.

3.2.6 All UKCEH people, if they consider there may be a risk of modern slavery, are expected to raise this issue to their line manager project manager, or UKCEH HR. This applies whether there is a concern about a particular act, the treatment of workers more generally, or the working conditions within any part of our business or supply chains.

3.2.7 UKCEH aims to encourage openness and will support anyone who raises genuine concerns in good faith under this procedure, even if they turn out to be mistaken. We are 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 People & Skills immediately.

3.2.8 Training on the risks associated with modern slavery is available from UKCEH's training catalogue.

3.2.9 Any UKCEH employee who breaches this procedure will be dealt with under the UKCEH Disciplinary Procedure.

## **4 Governance**

### **Compliance, monitoring and review**

4.1 The procedure complies with legislation and is underpinned by statutory obligations in the following areas:

- Modern Slavery Act
- The Employment Act
- The Equality Act
- The Data Protection Act
- The Human Rights Act
- The Health and Safety at Work Act
- The Bribery Act

4.2 The procedure should be read in conjunction with the Codes of Conduct, Ethics and Safeguarding.

4.3 The procedure will be regularly reviewed to incorporate any legislation changes. The TU may request that a procedure is reviewed.

**End of Document**