Contents

Version number: 0.07	Approved by: VCE
Effective from: 31 December 2017	Date for review: 31 December 2020

Summary of policy

The OU's Modern Slavery Policy states our aim to use all reasonable endeavours to ensure that no modern slavery or human trafficking in any form is taking place in our supply chains or in any part of our institution.

Scope

What this document covers

This policy applies to all people working for The Open University and its subsidiaries in any capacity and location, including employees, agency workers, contractors, suppliers and partnership organisations. We all have responsibilities under this policy and if you suspect someone is being exploited or ill-treated then you should discuss your concerns with your line manager. Suppliers will be required to demonstrate that all reasonable steps are taken to eradicate modern slavery in their supply chains. The safety of all staff is accorded utmost priority and is the shared responsibility of all staff at The Open University.

What this document does not cover

This policy does not apply to Open University students, but if you have any suspicion that a student may be subjected to modern slavery or human trafficking, please refer any concerns to safeguarding-referrals@open.ac.uk which is our encrypted mailbox staffed by a number of us in the team.

Related Documentation

The following documents can be referred to in conjunction with the modern slavery policy and can be accessed via the following links:

OU references

- OU's Statement on Eradicating Modern Slavery in Supply Chains
- Procurement Policy
- Policy for ensuring the safety of children and vulnerable/protected adults at The Open University
- Bullying and Harassment Policy
- Whistle blowing policy
- Equality Scheme 2016-2020

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External references

- [Modern Slavery Act 2015](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)

Introduction

What is Modern Slavery?

Modern slavery is an umbrella term that covers the offences of human trafficking and slavery, servitude and forced or compulsory labour, 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. It is a highly complex and hidden crime that is a violation of fundamental human rights. The UK Government has estimated there are 13,000 victims of modern slavery in the UK and the number is increasing.

The Modern Slavery Act 2015

In 2015 the Modern Slavery Act was passed, requiring all companies with a turnover of more than £36 million operating in the UK to publish an annual slavery and human trafficking statement outlining their approach to identifying and eradicating slavery in their supply chains.

While the risks of modern slavery in The Open University's direct activities are likely to be low, there are potential risks of modern slavery through goods and services we procure that can be linked to supply chains around the world.

In 2016-17, the University spent over £100m on goods and services from over 4,000 3rd party suppliers. The largest categories of spend were in the areas of marketing consultancy, IT software & hardware, course materials production and various estates management services.

OU Modern Slavery Statement

The OU's statement on eradicating modern slavery in supply chains can be read here: [OU's statement](#)

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The OU's Modern Slavery Policy expands on the statement and describes in more detail our aims and objectives in eliminating modern slavery in our institution, partner institutions and supply chains and how we aim to achieve this

This policy has been informed, and is compliant with relevant equality and diversity legislation. It is not anticipated that the policy will have any negative impact on any protected groups.

For specific guidance on how this policy may relate to your personal circumstances, please contact the *Equality, Diversity and Information Rights Team or your HR Partner* who will be able to advise on the implementation of policy.

Policy

1. Purpose

The Open University aims to use all reasonable endeavours to ensure that no modern slavery or human trafficking is taking place in our institution or in any part of our supply chains.

1.2. The objectives of this policy are:

1.2.1. To identify and assess potential risk areas and use processes to remove the potential for slavery or human trafficking wherever we can do so.

1.2.2 To raise awareness of all staff to the risk of modern slavery, particularly those whose work is involved with at risk areas and locations.

1.2.3 To implement processes to scrutinise recruitment procedures of the University and its partner institutions, supply chains, agents, etc.

1.2.4 To require suppliers to take all reasonable steps to eradicate modern slavery in their supply chains.

2. Policy principles

The Open University is committed to developing an inclusive University community and contributing to an inclusive and just society where people are treated with dignity and respect, where inequalities are challenged, and where we anticipate and respond positively to different needs and circumstances.

The Public Sector Equality Duty under Section 149 of the Equality Act 2010 requires us to have due regard to the need to eliminate discrimination, advance equality and foster good relations between groups of people.

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The Open University will commit the necessary resources in terms of people, time and money and effective internal arrangements to make sure that we comply with our statutory duties and that our equality scheme is implemented effectively.

Glossary of terms	
Modern slavery	Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery , servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
Human trafficking	Human trafficking is modern-day slavery and involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. Traffickers use force, fraud, or coercion to lure their victims and force them into labour or commercial sexual exploitation.
Safeguarding	Safeguarding adults includes: Protecting their rights to live in safety, free from abuse and neglect. People and organisations working together to prevent the risk of abuse or neglect, and to stop them from happening.
The Public Sector Equality Duty	The public sector equality duty is a duty on public authorities to consider how their policies or decisions affect people who are protected under the Equality Act. Private organisations and individuals don't have to comply with the duty.
Whistle blowing	Whistleblowing occurs when an individual raises concerns, usually to their employer or a regulator, about a workplace danger or illegality that affects others. The Public Interest Disclosure Act 1998 is the key piece of UK legislation protecting individuals who 'blow the whistle' in the public interest.
Supply chain	A supply chain is the entire process of making and selling commercial goods, including every stage from the supply of materials and the manufacture of the goods through to their distribution and sale.

Further clarification

If you have any queries around the content provided within this document and how to interpret it, please contact the Equality Diversity and Information Rights team (strategy-equality@open.ac.uk) who will be able to provide information, advice and guidance.

If you have any comments about this policy document and how it might be improved, please submit these to APG-Policy-Team@open.ac.uk.

Alternative format

If you require this document in an alternative format, please contact Sally Medway (sally.medway@open.ac.uk)

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Document Control

Version number: 0.07	**Author**: Sally Medway, Manager, Equality Diversity and Inclusion, Academic Policy and Governance
Effective from: 31 Dec 2017	**Policy owner**: Jiten Patel, Head of Equality, Diversity and Inclusion, Academic Policy and Governance
Date for review: 31/12/2020	**Approved by**:
Review cycle: 3 years	**Notable change**: New Policy
Triggers for ad hoc review: Change in legislation	

Overview of Scope

This policy covers all staff (Permanent, contracted and temporary) and suppliers to ensure that the University is compliant with the Modern Slavery Act 2015.

The Policy covers England, Northern Ireland, Scotland, and Wales

Has the Student Policy and Procedure Framework been followed? Yes ☒   No   ☐

Have you considered relevant legislation, laws, regulations and policies, e.g.		**Have you carried out all necessary checks?**	
Prevent	☒	Equality Analysis	☒
Consumer Law including Competition and		Student consultation	☐
Welsh language compliance	☐	Research Degrees Office	☐
Data Protection	☒	Apprenticeship Office	☐
QAA UK Quality Code for Higher Education	☐	Correct approvals route	☒
Student Charter	☐	Operational feasibility	☒

Please list all relevant Principles of Student Charter covered by this policy/procedure with links. N/A

Related policies, procedures, guidelines, regulations, forms, templates (include internal and external)	- OU's Statement on Eradicating Modern Slavery in Supply Chains - Policy for ensuring the safety of children and vulnerable/protected adults at The Open University - Bullying and Harassment policy - Whistle blowing policy - Equality Scheme 2016-2020 - Procurement Policy - Modern Slavery Act 2015 - Equality Act 2010 - Human Rights Act 1998
Internal policies/ procedures superseded	OU Statement on eradicating modern slavery in supply chains

by this document

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Policy effectiveness measures/KPIs

- Potential risk areas assessed and processes developed to remove the risk of slavery and human trafficking.
- Awareness training of all staff in at risk areas and locations
- Recruitment and supply chain processes developed to eradicate modern slavery

Keyword list

Modern slavery policy; human trafficking,