



Oriel College

UNIVERSITY OF OXFORD

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Version	Owner	Agreed by Finance and Estates Committee	Agreed by Governing Body	Reason for amendment	Amended by	Next review	Further notes
v.1	Head of HR	4 October 2023	11 October 2023	This is the original version.	Governance Officer	October 2024	

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A. Introduction

This policy sets out Oriel College's ("the College") actions to understand potential modern slavery risks related to its business and to protect and support our vulnerable employees. It seeks to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and supply chains to ensure the wellbeing and safety of the Oriel community.

This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

As part of the Higher Education sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

The College is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

B. Information Security Classification

This policy represents a public declaration of the College's commitment to opposing all forms of slavery and human trafficking and as such will be posted on the College website.

The policy will also be internally available to College members via the SharePoint policy resource.

C. Delegated Authority

The Governing Body has delegated responsibility for this policy to the Finance and Estates Committee. The Finance and Estates Committee is responsible for ensuring that this policy is reviewed annually and published online to the College website.

The Head of HR is the owner of this policy. The Head of HR is responsible for ensuring that the policy is updated in line with legislative or regulatory changes, and that any changes are brought to the Finance and Estates Committee for approval.

It is the responsibility of all College members to be aware of the risks of modern slavery and human trafficking and to report any suspicious activity to the relevant authorities.

D. Policy Statement

Oriel College strongly condemns human trafficking, modern slavery, and all forms of exploitation. This policy sets forth a framework to ensure that all operations undertaken by the College maintain the utmost standards of transparency, integrity, and legal compliance

and remain free from any involvement in or support of such illicit activities. It applies to every member of the College community, as well as all individuals and entities connected to the College, including contractors, vendors, and external parties engaged in our activities. It also seeks to reaffirm the College's commitment to the wellbeing of our staff and wider community. The policy outlines steps to ensure vulnerable employees are sufficiently supported and aware of the assistance the College can provide.

This policy acknowledges the responsibility of the College to perform sufficient due diligence on its business and supply chains as well as providing training and awareness to its employees. In turn members of the Oriel community and those associated with it are required to:

- not participate or be involved in any form of slavery, human trafficking or coercive labour;
- understand and perform their responsibilities as outlined under this and related policies;
- report any suspicion of slavery or human trafficking or any irregularities immediately;
- ensure all policies are followed at all times, and any updates to prevent vulnerabilities in the Anti-Slavery and Human Trafficking Policy are suggested; and
- guard against any form of coercive labour by or on behalf of anyone associated with the College.

E. Definition of Terms

Slavery: The exploitation of an individual by others for personal or commercial gain. Whether tricked, coerced, or forced they are deprived of their freedom, autonomy, and rights.

Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of individuals through the use of force, coercion, deception, or other means, with the intent to exploit them for forced labour, sexual exploitation, slavery, or other forms of servitude.

Coercive Labour: Work or service exacted involuntarily from an individual under menace of punishment, such as violence, intimidation, manipulated debt, threats of denunciation to immigration authorities and more.

Vulnerable Individuals: Individuals who are at a heightened risk of becoming victims to forms of exploitation, such as human trafficking, due to their social, economic or personal circumstances.

F. Scope

This policy is designed to safeguard against slavery and human trafficking within all areas of College's operation.

Particular care should be given by those listed in **section H** as responsible for safeguarding against high risk or known activities in which slavery and/or human trafficking is a problem.

All staff are required to complete the training and adhere to the KPIs set out in **section H**.

Employees and College members have a duty to report any suspected instances of slavery and/or human trafficking to their department heads.

G. Training and Responsibilities

Training

The following training is required within the College to better understand and respond to identified slavery and human trafficking risks:

- ***Modern Slavery – iHasco module (for managers)***

The training package covers the following areas:

- the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the College's operation, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- What help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority, and the "Stronger Together" initiative.
- What messages, business incentives, or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

Awareness Programme

As well as the above training provision, we will raise awareness of modern slavery issues by putting up posters on College notice boards. These posters explain to staff:

- The basic principles of the Modern Slavery Act 2015.

- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation.
- What help is available, for example through the Modern Slavery Helpline.
- Who to contact in the College if employees are concerned with potential slavery or human trafficking issues related to College operations.

H. Internal Help and Raising Concerns

If an individual suspects that they have uncovered an instance of slavery or human trafficking while under employment at the College, they should notify their head of department immediately, who will report the case to the relevant authorities.

I. Consequences of Non-Observance

As stated in **section G**, all employees are required to complete compulsory training and adhere to KPIs identified in **section H**. Failure to do this may result in temporary suspension of all or part of an employee's tasks until this training is completed.

Appropriate disciplinary action will be taken if an employee is found to be disregarding the stipulations set out by this policy.

J. Further Help

Questions relating to the statements and guidance set out in this policy should be directed to the Head of HR in the first instance.

K. Reference

We operate the following policies that describe our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in its operations:

- Whistleblowing Policy – we encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the College.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employees, customers, or others who have concerns, can complete our confidential disclosure form. This form can be found at **appendix A**.

- Employee code of conduct – Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

The College's code of conduct can be found internally on the policy SharePoint resource, or by contacting the Governance Officer, on governance@oriel.ox.ac.uk.

- Supply Staff procedure – We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

The Supply Staff procedure can be found internally on the policy SharePoint resource, or by contacting the Governance Officer on governance@oriel.ox.ac.uk.

L. Appendices

Appendix A – Confidential Disclosure Form

Protected Disclosure of Information Form

Before you complete this form please note that all disclosures must be made in good faith and relate to a matter that you have reasonable grounds to be concerned about. It must not be merely intended to undermine the reputation of any colleague or service provider. If you make a disclosure which you know or reasonably ought to know to be false you will be guilty of an offence under the Protected Disclosures Act of 2000.

Name of employee making disclosure: _____

Job title: _____

Department: _____

Details of the disclosure: _____

