

Gisma University of Applied Sciences

Modern Slavery Policy

1. Introduction

Gisma University of Applied Sciences is committed to promoting ethical practices and fostering an environment of transparency, integrity, and respect for human rights. This policy outlines our stance against modern slavery and human trafficking, in alignment with our legal obligations and moral responsibilities. Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking, all of which are severe violations of fundamental human rights.

2. Key aims and Principles

The purpose of this policy is to:

- Clearly define Gisma University of Applied Sciences' commitment to combat modern slavery and human trafficking in all its forms.
- Ensure compliance with relevant legislation, including international and national laws, and standards against modern slavery.
- Establish a framework for identifying, preventing, and addressing risks of modern slavery in our operations, supply chains, and partnerships.

3. Scope

This policy applies to all staff, students, suppliers, contractors, and partners of Gisma University of Applied Sciences. It extends to all university activities, including research collaborations, procurement practices, and international partnerships, regardless of geographic location.

4. Responsibilities

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the Modern Slavery Act 2015. The University is committed to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business.

The University acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the University as a higher education institution considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the University or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).

- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited
- The University has developed an online training module on anti-slavery and anti-trafficking and completion is required or encouraged for a range of relevant new and existing employees, including all Finance Division staff and those in financial or purchasing roles across the wider University.
- The University highlights modern slavery issues within its ongoing communications programmes with the University's Departments, Faculties and other Institutions and with current trade suppliers to maintain and increase awareness of the issue.
- The University encourages anyone to raise any concerns about modern slavery.
- The University's Equality & Diversity, House Rules and Code of Conduct policies and procedures support its efforts to combat modern slavery and human trafficking.
- The University will continue to develop its commitment to combat modern slavery and human trafficking and will outline such activities within its annual anti-slavery and anti-trafficking statement.

4. Compliance

This policy applies to all employees, workers, consultants, and other persons doing business with the University, contractors, and suppliers

Should any of the above individuals infringe on any of the Responsibilities set out above, it may result in the University taking disciplinary action against individual(s) and/or terminating its relationship with any organization or supplier.

5. Responsibility for the provision

Responsibility for the effective implementation of the provision lies with the Managing Directors. Responsibility for reviewing and evaluating the effectiveness of the of this policy lies with the Director of Quality and Compliance.