Emmanuel College

Modern Slavery

Emmanuel College is committed to combatting slavery and human trafficking and to acting ethically and with integrity in our purchasing and employment activities. We take steps to prevent our activities benefiting from or being associated with modern slavery. This includes avoiding links to modern slavery through our suppliers or supply chain. We expect our suppliers, contractors and those with whom we do business to meet these same standards.

Modern slavery is both a crime and a violation of fundamental human rights. It encompasses slavery, forced and compulsory labour, servitude and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain. The College acts in accordance with the Modern Slavery Act 2015.

This policy applies to all those acting on our behalf, including Fellows, staff, agents, consultants, and other people and organisations who work with us such as contractors and suppliers.

The nature of our activities and the supply arrangements that we use mean that the risk of participating in modern slavery can generally be considered to be low. Higher Education, research, and the associated professional services, have not been identified as high-risk sectors. While building and maintenance contractors and food suppliers, for example, may be considered in general to be areas of potential risk, we make extensive use of collaborative purchasing arrangements with effective due diligence procedures (for example through the Catering Managers Purchasing Consortium) and we trade primarily with larger suppliers who are required by law to demonstrate measures taken to avoid direct or indirect involvement with modern slavery. However the risk of the College participating in modern slavery is assessed, we are committed to taking our responsibilities in this area seriously.

There remains a risk that a supply chain may involve hidden subcontractor reliance upon forced labour. Heads of Departments and all those placing purchase orders on our behalf must consider the transparency of supplier activities and the risk of hidden processes which would breach this policy. Statements of compliance provided by suppliers along with any accreditation relating to the wider supply chain will also be considered. The nature of production and employment practices typical within a sector, the location of a business activity, the nature of any sub-contracting arrangements, and the measures taken by a supplier to demonstrate compliance with the Modern Slavery Act 2015 are all relevant in assessing this risk. We will not trade with any high-risk supplier. The College will take steps to ensure that awareness of this policy amongst Heads of Departments, staff, and Fellows is high.

Any concern about a supplier or a College practice or activity in relation to modern slavery or human trafficking should be raised with the Bursar, the Head of HR or the Dean. If any such concern is reported it will be treated on a confidential basis if requested. Any member of staff or Fellow has a duty to report any such matter as soon as possible should they become aware of it.

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