

THE COURTAULD INSTITUTE OF ART MODERN SLAVERY AND HUMAN TRAFFICING POLICY

1. Purpose

- 1.1 This policy confirms how The Courtauld Institute of Art (hereinafter referred to as The Courtauld) conforms with the requirements of the Modern Slavery Act 2015, which is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery.

2. Scope

- 2.1 This policy confirms how The Courtauld will take steps to ensure that its business activities and associated supply chains are free of slavery and human trafficking.
- 2.2 This policy applies to all persons working for The Courtauld or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any Courtauld employee's contract of employment but The Courtauld may amend this at any time with prior consultation if deemed necessary.

3. Responsibility

- 3.1 The Governing Board has overall responsibility for ensuring that this policy complies with The Courtauld's legal and ethical obligations, and that all those under its control comply with it.
- 3.2 The Head of Estates and Facilities has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. Procedure

- 4.1 This policy will be reviewed and updated at least once annually normally in the autumn term of each academic year by the Head of Estates and Facilities in-consultation with the Head of Human Resources and Head of Finance. The review and any updates made will reflect any changes in legislation and or other appropriate guidance. Following agreement on updates, a revised version of the policy will be put to Senior Management Team for review and formal approval of the Director in the autumn term.

5. Equality Implication

- 5.1 There are no known impacts on equality in relation to protected characteristic groups i.e. age, ethnicity, sex, disability, sexual orientation, religion, belief or non-belief, pregnancy or maternity, civil partnerships or marriage or gender identity for both staff and students in respect to this policy.

6. Policy Document

6.1 Vision and Values

- 6.1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as 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.
- 6.1.2 The Courtauld has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 6.1.3 The Courtauld is committed to ensuring that there is transparency in all its business and in its approach to tackling modern slavery throughout its supply chains. The same high standards are expected from all of The Courtauld's contractors, suppliers and other business partners and that these are consistent with disclosures provided under the Modern Slavery Act 2015. Wherever practicable, The Courtauld will seek to include in its contracts with business partners' specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that its suppliers will hold their own suppliers to the same high standards.

6.2. Compliance with the policy

- 6.2.1 All staff must ensure that they read, understand and comply with this policy.
- 6.2.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for or under The Courtauld's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.2.3 All staff must notify their line manager, or the Head of Estates and Facilities, as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.2.4 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of The Courtauld's business or supply chains at any level of supply at the earliest possible stage.
- 6.2.5 If a member of staff believes or suspects a breach of this policy has occurred or that it may occur they must notify their line manager or the Head of Estates and Facilities or report it in accordance with The Courtauld's Whistleblowing Policy as soon as possible.
- 6.2.6 If a member of staff is unsure about whether a particular act, the treatment of workers more generally, or the working conditions within any tier of The Courtauld's supply chain(s) constitutes any of the various forms of modern slavery, this must be raised with the respective line manager or the Head of Estates and Facilities.
- 6.2.7 The Courtauld encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.2.8 The Courtauld is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they must inform the Head of Estates and Facilities immediately. If the matter is not remedied, and they are an employee, it must be raised formally using The Courtauld's 'Grievance Procedure'.

6.3 Communication and awareness of this policy

6.3.1 Training on this policy, and on the risk that The Courtauld's business faces from modern slavery in its supply chains, will be provided as necessary. This document will be included within the induction process so that all staff read and acknowledge the policy.

6.3.2 The Courtauld's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6.4 Breaches of this policy

6.4.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

6.4.2 The Courtauld may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

6.5 Interaction with other Workplace Policies and Procedures

6.5.1 This policy is consequential with the other workplace policies and procedures that can be found on The Courtauld's SharePoint.

6.5.2. All those to whom this policy applies are encouraged to familiarise themselves with the policies detailed below. Any queries regarding this policy should be directed to the Head of Estates and Facilities.

7. **Document Owner and Approval**

7.1 The Courtauld's Head of Estates and Facilities is the owner of this document and is responsible for ensuring that this policy is annually reviewed and updated to comply with statutory guidelines and or other Courtauld policies and procedures. A current version of this document is available on The Courtauld web-site.

7.2 This policy was updated and approved by The Courtauld Senior Management Team on 29 November 2018 and is issued on a version controlled basis under the signature of the Head of Estates and Facilities.

Signature:	Date: 29 November 2018
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Change History Record

Issue	Description of Change	Approval	Date of Issue