

ANTI-SLAVERY AND HUMAN TRAFFICKING

1. Introduction

Modern slavery is a crime and a violation of fundamental human rights hence Novena University is committed to understanding potential modern slavery and human trafficking risks and to improving the university's systems and put controls in place to combat them.

In accordance with of the Modern Slavery Act 2015, the Nigerian Criminal Code and the Nigeria 1999 Constitution, Novena University makes the following statement regarding the steps it has taken in the year 2019 and 2020 to ensure that no modern slavery or human trafficking is taking place in any part of the university's system or in its subsidiary companies.

2. Purpose

Novena University's Anti-Slavery Policy emphasis zero tolerance for modern slavery, servitude, forced or compulsory labour, human trafficking, and also makes provisions for the protection of victims.

3. Policy Statement

- 3.1 Novena University is also committed to ensuring there is transparency in both its business and in its approach to tackling modern slavery throughout its subsidiary companies. The University expects the same high standards from all contractors, suppliers, and other business partners and as part of the contracting process includes specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- 3.2 This policy applies to everyone working for or on behalf of Novena University in any capacity, including employees (Academic and Non-academic) at all levels.
- 3.3 This policy does not form part of any employee's contract of employment and may be amended at any time.

4. Responsibility for the Policy

- 4.1 The University Management Committee has overall responsibility for ensuring that this policy complies with the university's legal and ethical obligations and that all those under the university's control comply with it.
- 4.2 The university's Registrar has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, establishing and monitoring the Internal Audit Control System as well as procedures to ensure they are effective in opposing modern slavery.
- 4.3 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 on the issue of modern slavery.

- 4.4 Relevant and capable individuals and groups are invited to comment on this policy and suggest further ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the University's Vice Chancellor.

5. COMPLIANCE WITH THE POLICY

- 5.1 All staff of the university must read, understand, and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery is the responsibility of all those working for or with the University.
- 5.3 All staff are required to avoid any act that might lead to, or suggest, a breach of this policy.
- 5.4 All staff must inform their Heads of Departments as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in a later date.
- 5.5 All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the university's business at the earliest possible stage.
- 5.6 If a staff believes or suspects a breach of this policy has occurred or that it may occur, they must inform their Head of Department or Management Committee through the VC.
- 5.7 If a staff is unsure about whether a particular act, the treatment of workers generally, or their working conditions within any part of the university or any of its subsidiary companies constitutes any of the various forms of modern slavery, they should raise it with their Head of Department or to the university's Management Committee through the VC.
- 5.8 Novena University encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 5.9 Novena University is committed to ensuring nobody suffers any damaging treatment as a result of reporting in good faith of their suspicion that modern slavery of whatever form is or may be taking place in any part of the university's community.

6. Communication of the policy

Novena University is committed to addressing the issue of modern slavery in its operational business environment and this policy must be communicated to all its subsidiary companies, and vendors at the outset of the university's business relationship with them and reinforced as appropriate thereafter through the office of the Registrar.

7. Breaches of the Policy

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in termination or dismissal for misconduct or gross misconduct.
- 7.2 The University may terminate its relationships with vendor, individuals, group of individuals and or organisations who breach this policy in the course of their dealings.