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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



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BACKGROUND

Increased awareness of the existence of modern forms of slavery has turned the attention of the world towards ensuring that institutions and organizations are equipped to combat modern slavery. The University of Ghana, in support of international efforts in this direction, has developed a policy to combat modern slavery and human trafficking in its entire supply chain.

PURPOSE

The University of Ghana (UG), situated in a territory that was a victim of the North Atlantic Slave Trade, and thus fully aware of the devastating long and short term effects of slavery is fully committed to combatting modern slavery and human trafficking, as it seeks to provide the best environment for employees to work, innovate and develop and to be treated fairly and with respect. This statement outlines UG's zero-tolerance policy to modern slavery and human trafficking and its commitment to ensuring that modern slavery is not taking place in its operations nor in the operations of its supply chain, including partners and collaborating institutions. It also describes UG's due diligence processes, ways in which risks of modern slavery are minimized, and how awareness of modern slavery is raised among staff.

The University of Ghana (UG) is a public Higher Education Institution (HEI) established by an Act of Parliament, the University of Ghana Act, 2010 (Act 806) and has a mandate for teaching, learning, research, and extension services. As a state owned/ public institution, UG is required to abide by the national laws which include the 2003 Labour Act of Ghana (Act 651) and the Human Trafficking Act, 2005 (Act 694) aimed at addressing issues of labour and human trafficking.

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Slavery, servitude, forced labour, and human trafficking (exploiting a person for labour, services, or commercial sex) are human rights abuses. The University of Ghana does not tolerate, in any form or context, the use of servitude, forced or bonded labour, human trafficking, or slavery in its operations in any of our campuses.

The Constitution of Ghana, the Labour Act of Ghana (Act 651), the Human Trafficking Act (Act 694) and Regulation 21 of the Labour Regulations of 2007 prohibit all forms of forced labour, and UG strictly complies with those prohibitions.

UG is committed to the implementation of systems and controls which help to ensure that modern slavery is not taking place anywhere within its sphere of influence. This is evident in the provisions made in its policies and procedures that guide its activities. UG's key policies and procedures which contribute to minimizing the risk of modern slavery and human trafficking include:

- **Anti-Sexual Harassment policy** – which ensures that all staff, partners, consultants, and associates are treated with dignity and respect and free from sexual harassment.
- **Safeguarding policy** – which ensures that the people we work with, particularly children and adults-at-risk, are able to live free from harm or abuse of any kind by our operations or the conduct of our staff and associated personnel such as associates, interns, visitors, and consultants.
- **HR procedures** – which include UG's Code of Conduct, health and safety, grievance procedures, and other work-place policies, and pay grades.

- **Equality, Diversity, and Inclusivity Policy** – to prevent discrimination on any grounds protected by the law and to celebrate diversity.
- **Procurement policy** – which sets out the procedures for selecting suppliers, taking into consideration the suppliers' reputation and compliance with laws and ethical procedures.
- **Due Diligence Templates** – our template agreements and standard terms and conditions require collaborators to comply with the law, and include specific provisions in relation to modern slavery and human trafficking.
- **Anti-corruption policy** – which empowers staff and associates to report suspected dangers or wrongdoings at the workplace.
- **Ethics Policy** – which sets out standards of ethical conduct in terms of research involving human and non-human subjects.
- **Risk management policy** – which outlines UG's risk management strategy aimed at mitigating risks that threaten the achievement of UG's objectives.

Due diligence processes

Our due diligence processes require that our partners demonstrate their strong commitment to zero-tolerance of modern slavery and human trafficking. Where partners and contractors do not have a modern slavery and human trafficking policy, they are encouraged to adopt and apply our statement in their operations.

Identifying potential risk areas

We have assessed our operations and concluded that there is minimal risk of modern slavery in our operations. However, sub-standard work conditions could potentially occur within out-sourced services such as cleaning services. For all businesses

supplying us with these services, we require an undertaking that the businesses have a modern slavery policy, that they pay their staff at least the statutory minimum wage, and that they comply with the labour laws of the land. Our Logistics Directorate vets all our prospective suppliers to satisfy UG's requirement that no modern slavery or human trafficking is taking place in such businesses.

Modern slavery – this is the extreme opposite of decent work and constitutes criminal exploitation.

- MODERN SLAVERY: Worker cannot refuse or cease work because of coercion, threats or deception. Worker may also be deprived of personal freedom.
- DANGEROUS OR SUBSTANDARD WORKING CONDITIONS: Worker can refuse or cease work but doing so may lead to harm. Worker is not paid fairly and does not receive some or all entitlements. Worker may be required to work excessive hours. Workplace is unsafe.
- DECENT WORK: Workers' rights respected. Worker free to refuse or cease work. Worker paid fairly (at least the minimum wage). Workplace is safe.

Awareness and Training

Our commitment to addressing modern slavery in our operations will be communicated to all suppliers at the outset of our business relationships and reinforced as appropriate thereafter. Training on Modern Slavery and Human Trafficking will be provided to staff once every two years. Training will also be conducted for new staff, during their orientation.

Reporting

UG has over the period acted transparently in conducting its business and will continue to do so by disclosing information about any modern slavery risks that are identified and the appropriate actions taken to address those risks. Such disclosures will lead to improved outcomes for all members of the university community and the supply chain.

UG will continue to affirm its commitment to combat modern slavery and human trafficking and will prepare annual statements indicating the steps being taken to prevent modern slavery and human trafficking within our operations.

Version Control	Date Effective	Approved By	Amendment
1	April 11, 2022	Business and Executive Committee	

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UK Home Affairs
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University of Ghana Ethics Policy

UG Anti-Corruption Policy

UG Risk Management Policy

