

Modern Slavery & Human Trafficking Policy



Policy Code: GOV-POL-006

Owner: Office of the Vice President for
Administration, Finance and Community
Engagement

POLICY & PROCEDURES:

Modern Slavery & Human Trafficking Policy

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Version Control & Sign-Off Sheet

Version Control			
Version	Change reference	Approval	Dates
1	Initial version	University Council	1 September 2024
		Next Review	31 August 2025

1. Purpose

Applied Science University is committed to preventing modern slavery and human trafficking in all its forms across its operations and supply chains. This policy reflects the University's obligations under international conventions and the laws of the Kingdom of Bahrain, including the Labour Law (Law No. 36 of 2012) and the Anti-Trafficking in Persons Law (Law No. 1 of 2008).

2. Commitments

ASU commits to:

- Ensuring that no form of forced, bonded, involuntary, or trafficked labour is used in any of the University's operations or by any of its suppliers, contractors, or service providers.
- Requiring that all workers employed by the University or its contractors are free to leave employment with reasonable notice and are not subject to document confiscation, debt bondage, or any form of coercion.
- Paying all employees at least the minimum wage as prescribed by Bahrain law and ensuring timely payment of wages.
- Providing safe and hygienic working conditions for all workers on University premises.

3. Supply Chain Standards

All suppliers and contractors engaged by ASU must confirm, as part of their contractual obligations, that they do not use forced, bonded, or trafficked labour and that they comply with all applicable labour laws. Supplier contracts shall include a Modern Slavery clause, and failure to comply shall constitute grounds for contract termination.

4. Risk Assessment

The Administration and Finance Directorate shall conduct an annual risk assessment of the University's supply chain, prioritising high-risk categories such as construction, facilities management, cleaning, catering, security, and transportation services. The assessment shall identify potential risks of modern slavery and define mitigation measures

5. Supply Chain Due Diligence

ASU shall conduct annual supply chain audits of high-risk suppliers. Audits shall include review of employment contracts, wage records, working conditions, and worker interviews (where appropriate). Findings shall be reported to the University Council.

6. Reporting

Any employee, student, or member of the University community who suspects an instance of modern slavery or human trafficking must report it immediately through the University's confidential reporting mechanism (ethics@asu.edu.bh) or directly to the IEIC. The University shall protect reporters from retaliation.

7. Training and Awareness

ASU shall provide modern slavery awareness training to all staff involved in procurement, facilities management, and human resources. Training shall cover the identification of signs of modern slavery and the University's reporting procedures.