CHUKWUEMEKA ODUMEGWU OJUKWU UNIVERSITY

EMPLOYMENT POLICY ON PREVENTION OF MODERN SLAVERY AND HUMAN TRAFFICKING

1. PREAMBLE

Chukwuemeka Odumegwu Ojukwu University (COOU) maintains a policy of zero tolerance towards modern slavery, human trafficking, forced labor, debt bondage, and child exploitation in all its employment practices, supply chains, and institutional operations across all campuses.

The University is committed to fostering an ethical, transparent, and humane employment environment that upholds fundamental human rights, protects worker dignity, and guarantees freedom of employment for all personnel directly employed or engaged through third-party arrangements.

This Policy establishes the University's institutional standards for identifying, preventing, mitigating, and eradicating any form of modern slavery, involuntary servitude, forced labor, or human trafficking across its academic, administrative, and operational structures.

The Policy is intended to operate consistently with the Constitution of the Federal Republic of Nigeria, the Labour Act, the Trafficking in Persons (Prohibition) Enforcement and Administration Act, national human rights directives, the University's enabling statutes, and relevant International Labour Organization (ILO) Forced Labour Conventions.

2. PURPOSE

The Purpose of this Policy is to:

- prohibit all forms of modern slavery, forced labor, debt bondage, servitude, and human trafficking within the University;
- guarantee that recruitment, employment, and retention practices adhere strictly to ethical human resource standards;
- prevent exploitation within University supply chains, procurement contracts, and outsourced service operations;
- prohibit recruitment fees, retention of original identity documents, and unlawful restrictions on worker mobility;
- establish robust due diligence mechanisms for auditing contractors, vendors, and labor recruitment agencies;
- protect whistleblowers and victims of modern slavery from intimidation, harassment, or administrative retaliation; and
- provide an effective framework for reporting, investigating, and sanctioning violations of anti-slavery standards.

3. SCOPE

This Policy applies across all campuses, faculties, research institutes, administrative units, and commercial ventures of Chukwuemeka Odumegwu Ojukwu University, and covers:

- all direct employees, including academic staff, administrative staff, technical personnel, and junior staff;
- temporary, seasonal, part-time, ad-hoc, and contract workers;
- labor recruitment agencies, contractors, sub-contractors, vendors, and supply chain partners;
- outsourced service providers (including security, janitorial, catering, maintenance, and construction personnel); and

- all university bodies responsible for recruitment, procurement, contract management, and human resources.

Nothing in this Policy shall be interpreted as authorising involuntary labor, uncompensated overtime, withholding of identification documents, physical or psychological coercion, or any practice that undermines individual freedom of employment.

4. PRINCIPLES FOR PREVENTING MODERN SLAVERY

4.1 Freedom of Employment and Voluntary Labor

All employment within the University must be completely voluntary. Employees shall have the absolute right to terminate their employment upon giving reasonable, contractually agreed notice without financial penalties or unlawful withholding of earned remuneration.

4.2 Prohibition of Document Withholding

The University, its agents, contractors, and labor recruiters are strictly prohibited from retaining, confiscating, or destroying original identity documents, passports, national identity cards, academic certificates, or work permits belonging to any employee or worker.

4.3 Ban on Recruitment Fees and Debt Bondage

No worker shall be required to pay recruitment fees, processing charges, or security deposits directly or indirectly to secure employment or contracting opportunities at the University. Practices that induce debt bondage or financial servitude are strictly prohibited.

5. RECRUITMENT AND SUPPLY CHAIN DUE DILIGENCE

5.1 Fair and Transparent Recruitment

All recruitment procedures shall be transparent, objective, and compliant with statutory labor requirements. Written employment contracts detailing job duties, working hours, pay rates, and entitlement rights must be provided to all workers prior to commencement of service.

5.2 Procurement Diligence and Vendor Mandates

The University shall incorporate a mandatory **Anti-Modern Slavery Compliance Clause** into all procurement agreements, tenders, and third-party contracts. Vendors and service providers must verify that their workforce supply chains are free from forced labor, human trafficking, and child exploitation.

6. ETHICAL WORKING CONDITIONS AND WAGE PROTECTION

All workers performing duties on University properties shall be paid fair wages matching or exceeding statutory minimums, receive transparent wage slips, and work within standard statutory hours. Overtime must remain strictly voluntary and fully compensated in accordance with labor laws.

7. PROTECTION FROM RETALIATION AND WHISTLEBLOWER SAFEGUARDS

No employee, contract worker, or member of the public shall be subjected to retaliation, discrimination, threats, or loss of employment for raising concerns or reporting suspected instances of modern slavery, human trafficking, or forced labor occurring within the University or its supply chains.

8. RESPONSIBILITIES OF EMPLOYEES AND CONTRACTORS

All employees, contractors, and service providers shall:

a. refrain from engaging in, facilitating, or condoning any activity associated with forced labor or human trafficking;

b. report suspected modern slavery practices or supply chain violations to designated institutional authorities;

c. cooperate fully with internal audits, investigations, and biosecurity/compliance assessments; and

d. ensure that sub-contractors and recruitment agencies operate in full alignment with this Policy.

9. RESPONSIBILITIES OF THE UNIVERSITY MANAGEMENT

The University Management shall:

a. enforce compliance with anti-slavery standards across all institutional operations and procurement activities;

b. conduct risk-based assessments and periodic audits of high-risk operational sectors and third-party vendors;

c. terminate contracts and initiate legal proceedings against vendors or individuals engaged in modern slavery;

d. provide confidential reporting channels and support mechanisms for potential victims of exploitation; and

e. organize periodic capacity building and awareness programs on anti-trafficking and ethical employment for staff.

10. GOVERNANCE AND OVERSIGHT

The University shall designate the **Anti-Modern Slavery and Ethical Employment Oversight Panel** (comprising representatives from Legal Unit, Human Resources, Procurement, Works & Services, and Security Directorate) to:

a. monitor the implementation and enforcement of this Policy across all university campuses;

b. investigate reported allegations of modern slavery, forced labor, or recruitment exploitation;

c. conduct annual due diligence reviews of third-party contractors and labor suppliers; and

d. submit an annual Anti-Modern Slavery and Human Rights Compliance Statement to the Vice-Chancellor and Council.

11. PUBLICATION AND TRANSPARENCY

This Policy and the annual Anti-Modern Slavery Statement shall be published on the official University website and made accessible across administrative portals. The Policy shall be attached to all employment offers and third-party contracting documents.

12. REVIEW AND REVISION

This Policy shall be reviewed at least once every three years or earlier where required by statutory amendments, international human rights standards, or directives from government regulatory authorities. All revisions shall be formally documented and approved.



Prof. Kate Azuka Omenugha, Fnipr

Vice Chancellor **Date:** 24/10/2026