Policy Against Forced Labour, Modern Slavery, Human Trafficking and Child Labour (Version 1.0)

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Policy Owner: Human Resources Department

Approved By: Competent Authority **Review Frequency:** Annually or as required

A. Preamble

Geeta University is committed to human dignity, fundamental rights, ethical employment and responsible operations. It maintains a zero-tolerance approach towards forced labour, bonded labour, modern slavery, human trafficking and unlawful child labour in its employment practices, campus operations, procurement and supply chains. This policy seeks to prevent exploitation, protect vulnerable individuals, promote responsible recruitment and ensure that employees, contractors, agencies and suppliers comply with applicable laws and the University's ethical standards.

B. Objectives

- Prohibit forced labour, bonded labour, trafficking, modern slavery and unlawful child labour in all University operations and associated activities.
- Ensure all employment is voluntary, on lawful and transparent terms, free of exploitation, coercion and deceptive recruitment.
- Safeguard vulnerable workers, ensure responsible engagement of contractors and suppliers, provide reporting mechanisms and support, and monitor compliance.

C. Scope and Applicability

This policy applies to all activities undertaken by or on behalf of the University, including:

- Academic, administrative and research operations and all employees, including temporary and contractual staff.
- Security, housekeeping, maintenance, horticulture, transport, catering, construction and other outsourced personnel, and workers engaged through manpower agencies and labour contractors.
- Suppliers, vendors, consultants and service providers; construction and facility projects; procurement; internships and apprenticeships; and any activity on University premises or under its direction.

D. Definitions

(a) **Forced Labour:** Work or service exacted under threat of penalty or coercion and not offered voluntarily, as understood under law.

(b) **Modern Slavery:** Exploitative practices depriving individuals of freedom or control over their work or lives, including forced and bonded labour, servitude and slavery-like practices.

(c) **Human Trafficking:** Recruitment, transportation, transfer, harbouring or receipt of persons through prohibited means for exploitative purposes, as defined by law.

(d) **Child Labour:** Employment or engagement of a child in work prohibited by law, interpreted in line with statutory age limits, permitted exceptions and restrictions on adolescents.

(e) **Bonded Labour:** Labour arising from a debt or obligation that unlawfully restricts freedom to leave employment.

(f) **Ethical Recruitment:** Recruitment that is transparent, voluntary and free of deception, coercion or unlawful fees.

(g) **Vulnerable Worker:** A person at increased risk of exploitation because of age, migration status, hardship, disability, language barriers or dependency on an employer.

E. Fundamental Policy Commitments

- **Zero tolerance:** prohibited practices shall not be knowingly tolerated in operations, contracts or supply chains.
- **Voluntary employment and freedom of movement:** all employment rests on free and informed consent; workers may leave under lawful notice terms and shall not be unlawfully confined or restrained.
- **Fair remuneration:** lawful wages paid on time; no worker compelled to work to repay an unlawful fee or debt.
- **Dignity and accountability:** no threats, violence or humiliation; suspected violations shall be assessed promptly and acted on as the law permits.

F. Prohibition of Forced Labour and Modern Slavery

The following practices are prohibited in University operations and associated employment arrangements:

- Requiring work through threats, violence, intimidation, coercion or unlawful pressure.
- Withholding wages or unlawfully deducting salary to compel continued work.
- Confiscating or retaining identity documents, passports, certificates, bank cards or other personal documents to restrict freedom.
- Imposing unlawful recruitment fees, debt arrangements or repayment obligations that create forced labour.
- Preventing resignation or departure through threats or unlawful penalties, unlawful confinement, or threats against workers or their families.
- Deceptive or fraudulent recruitment, servitude or other exploitative arrangements prohibited by law.

G. Prevention of Human Trafficking

(a) The University shall not knowingly engage in or facilitate trafficking. Recruitment shall follow lawful, verifiable procedures, with scrutiny of manpower agencies, labour contractors and intermediaries.

(b) Recruitment shall not involve false promises, deceptive relocation, coercion, unlawful charges or debt, or concealment of the employer or nature of work.

(c) On reasonable suspicion of trafficking, the University shall protect the individual and refer the matter to competent authorities.

H. Prohibition of Child Labour

(a) No child shall be employed or engaged in work prohibited by law in University operations, including construction, housekeeping, catering, security, maintenance, laboratories and workshops. The University shall comply with statutory restrictions on adolescents, including those on hazardous occupations.

(b) Age shall be verified through lawful documentation where required, and no contractor or supplier shall employ children in prohibited work for the University; minors in apprenticeships or internships must meet all legal requirements.

(c) If child labour is suspected, the University shall prioritise the child's safety and welfare and refer the matter to competent authorities or the child-protection mechanism; it shall not allow a contractor to conceal or continue an unlawful arrangement.

I. Ethical Recruitment and Protection of Workers

- **Transparent terms:** workers shall be informed, in a language they understand, of duties, wages, working hours, leave, notice procedures and accommodation arrangements.
- **Fees and documents:** no unlawful or coercive recruitment fees; personal documents remain with the individual, except lawful, documented temporary handling.
- **Wages and exit:** wages shall be paid lawfully with records maintained; unauthorised deductions or withholding are prohibited; workers may resign under applicable law without threats or unlawful penalties.
- **Migrant and contractual workers:** accommodation shall not restrict movement; workers shall have safe reporting channels and protection from retaliation, and the University shall investigate identified risks within its authority.

J. Contractor, Supplier and Service Provider Responsibility

(a) The University shall communicate this policy to contractors, suppliers and agencies, and contracts may require them to comply with labour laws, maintain worker, wage and age-verification records, prohibit unlawful fees, coercion and document confiscation, prevent child labour, cooperate with reviews and report suspected violations.

(b) Violations shall be corrected promptly, and the University may conduct risk-based assessments or request documents, consistent with contractual rights and law.

(c) For serious violations, the University may suspend work, require remediation, or terminate engagement where legally permissible, without prejudice to its duty to protect affected individuals and meet reporting requirements.

K. Risk Assessment and Due Diligence

The University shall identify and address risks in its operations and supply chains, prioritising higher-risk activities such as work through labour contractors, construction and outsourced services, high recruitment fees or wage deductions, inconsistent records, restrictions on movement or documents, and complaints of coercion or unpaid wages.

L. Reporting Mechanism and Grievance Redressal

Anyone may report suspected violations to HR, the designated grievance authority or another established channel; anonymous reports may be considered. The procedure is:

- **Receipt and assessment:** the designated authority records the report securely and assesses urgency, risk and need for immediate protection.
- **Protection and referral:** where life, safety or liberty is at immediate risk, emergency or competent authorities shall be contacted; suspected trafficking, bonded labour or child labour shall be referred under law.
- **Investigation and action:** an appropriate inquiry is conducted within the University's authority, records preserved, and remedial, contractual, administrative or disciplinary action initiated where a violation is established.
- **Follow-up:** corrective actions are monitored and a confidential record kept.

No one shall face retaliation for a good-faith report or for assisting an authorised investigation. Information shall be shared only as needed with authorised persons or competent authorities.

M. Protection and Remediation of Affected Individuals

Where a person is identified as potentially affected, the University shall prioritise safety, dignity and lawful remediation within its authority. Measures may include reducing further harm, referral to authorities or support organisations, access to medical, legal or counselling services, recovery of withheld documents, correction of unpaid wages where legally due, and follow-up. Children's best interests prevail, and no action shall knowingly expose anyone to further danger or obstruct authorities.

N. Roles and Responsibilities

a. University Management

- Provide oversight and resources.

b. Human Resources Department

- Communicate the policy, promote ethical recruitment, maintain records, coordinate complaint review and refer suspected criminal violations to authorities.

c. Procurement and Administration

- Communicate requirements to vendors, include contractual provisions, conduct risk-based reviews and escalate suspected violations.

d. Heads of Departments, Contractors and Employees

- Heads, supervisors and contractors ensure lawful practices, report suspected exploitation and correct violations promptly.
- Employees and workers should report suspected violations in good faith and cooperate with investigations.

O. Awareness, Monitoring and Documentation

The University shall train employees, supervisors, procurement personnel, contractors and providers on indicators of forced labour and trafficking, child labour, ethical recruitment and wage practices, and reporting procedures, through induction, workshops and notices. HR shall keep records of awareness, vendor declarations, risk assessments, age-verification and wage-payment, complaints, investigations, corrective actions and compliance reports, securely with restricted access.

P. Non-Compliance, Review and Implementation

Where non-compliance is established, action may include corrective instructions, remedial action for affected workers, recovery of unpaid wages where legally due, disciplinary action, suspension or termination of contractors where legally permissible, and referral to authorities. HR shall review this policy annually with Procurement and Administration; amendments require approval of the competent authority. This policy takes effect from the date of approval and shall be communicated to all concerned.

Deputy Registrar

Satya Vir Singh

Registrar

GEETA UNIVERSITY REGISTRAR PANIPAT