

Policy and Procedures Governing Modern Slavery

1. Purpose and policy commitment

Fujairah University (FU) prohibits modern slavery and shall prevent, identify, report, and address exploitation in its operations and business relationships. This policy protects human dignity and establishes accountable employment, purchasing, and safeguarding practices. It also supports the QS Stars expectation that a modern slavery policy is publicly available.

2. Scope and meaning

This policy applies to all FU employees, students, governing-body members, volunteers, recruitment agents, contractors, suppliers, subcontractors, and partners in activities connected with the University, including outsourced services, research, internships, placements, and overseas activities.

Modern slavery is an umbrella term covering slavery, servitude, forced or compulsory labor, debt bondage, human trafficking, forced marriage, and the worst forms of child labor. Forced labor involves work or service exacted under threat of a penalty without genuine voluntary consent. Trafficking involves recruitment, movement, or exploitation; it does not require crossing a national border. Applicable statutory definitions prevail.

3. Mandatory prevention standards

- Voluntary work: No person shall be compelled to work through threats, violence, deception, debt, confinement, abuse of vulnerability, or threats relating to immigration status. Workers must be free to leave employment subject to lawful notice requirements.
- Ethical recruitment: FU and its labor suppliers shall use appropriately licensed recruiters, verify identity and legal eligibility, and provide accurate written terms in a language workers understand. Recruitment fees and related employment costs shall not be charged to workers directly or indirectly. Prohibited charges shall be remedied and reimbursed.
- Employment safeguards: Pay wages accurately and on time; observe applicable working-time, rest, leave, and safety requirements. Do not use withheld pay, unlawful deductions, deposits, or restrictions on movement to control workers. Workers shall retain control of passports and identity documents; any temporary handling for lawful processing must be documented and followed by prompt return.
- Child protection: Prohibit child labor that is unlawful, hazardous, exploitative, or interferes with education. Any lawful employment or placement of a young person requires verified age, applicable permissions, and documented safeguarding controls.
- Third-party conduct: Suppliers and partners shall comply with these standards and apply them to relevant subcontractors and recruitment agents. FU shall not knowingly procure goods or services produced through modern slavery or maintain an arrangement that perpetuates exploitation.
- Student protection: Academic units shall assess placement and internship hosts for exploitation risks and provide a safe route to report concerns. FU shall arrange a safe alternative where withdrawal is necessary; raising a concern in good faith shall not itself cause academic disadvantage.

4. Responsibilities and accountability

The University President provides oversight, authorizes institutional action within delegated authority, and receives the annual implementation report. Matters reserved to the governing body follow the University's governing instruments.

The Vice President for Administration and Finance owns the policy, assigns resources, oversees the risk register and corrective actions, and ensures serious concerns are escalated promptly.

Human Resources coordinates prevention, training, confidential intake, safeguarding, and case management.

Procurement conducts supplier screening, embeds contractual controls, monitors suppliers, and maintains purchasing evidence. Contract owners verify compliance during delivery.

Student Affairs and academic units support affected students and monitor placements and partnerships. The legal adviser advises on statutory reporting, fair investigation, contractual remedies, and data protection without delaying urgent protection or required external reporting.

Quality Assurance and Institutional Effectiveness Affairs (QA–IEA) verifies document control, implementation evidence, public availability, and QS evidence traceability. It provides independent assurance and does not replace operational accountability. All members of the University community shall report concerns and cooperate with authorized reviews.

5. Risk assessment and due diligence procedure

Before recruitment, supplier appointment, contract renewal, or a relevant placement or partnership, the responsible unit shall record an assessment of sector, geography, labor model, subcontracting, workforce vulnerability, and credible adverse information. Assign low, medium, or high risk with reasons and required controls. Review at least annually and after a significant change or concern.

Procurement shall prioritize labor-intensive and higher-risk activities, including cleaning, security, construction, catering, transport, accommodation, recruitment, and relevant goods supply chains. Basic screening shall check licensing, ownership, subcontracting arrangements, policy acceptance, and any credible exploitation concerns.

For higher-risk arrangements, verify evidence beyond supplier declarations: sample employment terms and wage records, recruitment-fee controls, identity-document practices, and working conditions. Use confidential worker interviews or independent assessment where appropriate. Record findings, an action owner, deadlines, and the approval decision. Unresolved indicators of exploitation require escalation before award or renewal.

Contracts shall require compliance with this policy; equivalent controls for subcontractors; prompt reporting of suspected exploitation; cooperation and proportionate access to records, sites, and workers; corrective action; and rights to suspend or terminate for serious breach. Apply these clauses to new and renewed contracts and prioritize amendments to existing high-risk arrangements.

6. Reporting and immediate protection procedure

Anyone may raise a concern orally or in writing through Human Resources, Student Affairs, or the Office of the President without first approaching a supervisor. Anonymous reports shall be accepted through an advertised reporting route. Before this policy takes effect, Human Resources shall publish functioning email, telephone, and in-person contacts on the policy webpage, including an independent escalation route to the governing body when senior leadership is implicated.

Report suspected exploitation promptly; proof is not required. Warning signs include fear, inability to speak freely, retained documents, withheld wages, unexplained recruitment debt, restricted movement, or threats. Record factual observations where safe. Do not confront a suspected exploiter or undertake a personal investigation.

Immediate danger requires immediate contact with emergency services or the competent authorities. Internal reporting or investigation shall never delay mandatory reporting to UAE authorities. A person who becomes aware of a human-trafficking offense must comply with the applicable statutory reporting duty; prior University permission is not required.

The receiving unit shall escalate urgent risks immediately and securely transfer other concerns to Human Resources. Human Resources shall acknowledge a contactable report within two working days, conduct an initial risk assessment within five working days, and arrange safe contact, interpretation, medical or psychosocial support, and referral to appropriate services as needed. These are maximum internal response times, not waiting periods for urgent action.

FU prohibits retaliation against anyone who reports in good faith, seeks assistance, or participates in an investigation, even where a concern is not substantiated. Information shall be shared only where necessary for protection, fair process, or legal duties. Absolute confidentiality cannot be promised where disclosure is legally required.

7. Investigation and remedy procedure

The policy owner shall appoint a competent investigator free from conflicts of interest, with independent oversight where management is implicated. FU shall preserve evidence securely, cooperate with authorities, protect affected persons, and provide fair opportunity for relevant parties to respond. Internal inquiries must not compromise criminal investigations.

The investigator shall agree a case plan, record findings and recommendations, and provide a progress update at least every 20 working days while the case remains open. Authorized officers shall decide disciplinary or contractual action under applicable procedures. Possible measures include suspending an activity, disciplining the employee, excluding the supplier, terminating the contract, and referring the case to authorities.

Remediation shall prioritize the affected person's safety and views, consistent with legal duties. Actions may include recovering unpaid wages, reimbursing recruitment fees, returning documents, providing access to support, and arranging safe alternative employment or placement. Disengagement shall be planned to avoid increasing harm; contractual termination alone does not establish that the harm has been remedied.

Each corrective action shall have an owner, deadline, and evidence of completion. Human Resources and the relevant contract or placement owner shall verify effectiveness before closure and monitor retaliation risks. A dissatisfied reporting person may request review through the independent escalation route; this does not restrict access to external authorities or remedies.

8. Training monitoring and public accountability

Human Resources shall provide induction awareness for employees and accessible information for students and contracted workers. Procurement, HR, contract managers, placement coordinators, and case handlers shall receive annual role-specific training. Information shall be available in languages and formats appropriate to those at risk.

The policy owner shall submit an annual report to the President covering risk assessments, due diligence, training, reports received, verified findings, remedies, and overdue actions. Measures shall include the percentage of new and renewed suppliers screened, high-risk suppliers reviewed, designated staff trained, and corrective actions completed on time. Targets are 100% for each of these coverage and timeliness measures; exceptions require explanation and a recovery plan. Low reporting volumes shall not be treated as proof that exploitation is absent.

FU shall publish the approved, current policy on its public website without a login requirement, showing approval, effective, and review dates and reporting contacts. QA–IEA shall retain the public URL, dated publication evidence, approval record, and implementation evidence for QS Stars review. FU shall publish an annual anonymized implementation summary that protects affected persons and active investigations.

9. Records implementation and review

HR shall retain restricted case records; Procurement shall retain supplier and contract evidence. Records shall follow the approved retention schedule and applicable legal requirements, with access controls and legal holds where needed. QA–IEA shall maintain the controlled policy and evidence index. Existing registers and repositories shall be used to avoid duplicate records.

Before commencement, the policy owner shall confirm assigned officers, reporting routes, support arrangements, contract clauses, communications, and training readiness. Review annually and after legislative changes, serious incidents, or changes to QS criteria, using FU's approved policy-development and approval procedures.

10. Reference framework

UAE Federal Decree-Law No. 24 of 2023 on Combating Human Trafficking, including Article 8; Federal Decree-Law No. 33 of 2021 on Regulating Labor Relations, as amended, including Article 14, and applicable executive regulations. Official texts: uaelegislation.gov.ae. Apply these instruments within their legal scope.

QS Stars, Rating universities on good governance, "Policies and provisions for sustainability and integrity": topuniversities.com/qs-stars/qs-stars/rating-universities-good-governance-qs-stars (checked 8 October 2026). This

policy supports the public-policy criterion; the award of QS Stars credit remains subject to the methodology applicable to FU's assessment and QS verification.