

Policy against Modern Slavery & Human Trafficking

PREAMBLE & STATEMENT OF INTENT

JSS Academy of Higher Education & Research (JSS AHER), Mysuru, is dedicated to upholding human dignity, fundamental rights, and ethical standards across all educational, healthcare, research, and administrative operations. The University maintains a zero-tolerance approach toward all forms of modern slavery, human trafficking, forced labor, servitude, and child labor.

In alignment with the Constitution of India, national labor laws, the UN Universal Declaration of Human Rights, and international standards against forced labor, JSS AHER commits to implementing robust procedures to prevent, detect, and eliminate modern slavery within its workforce, supply chains, contracted services, and collaborative ventures.

1. PURPOSE

The purpose of this Policy is to:

- Establish an absolute, institutional commitment against modern slavery, forced labor, human trafficking, and child labor across JSS AHER.
- Ensure ethical recruitment, fair labor practices, and safe working conditions for all direct, indirect, contractual, and outsourced personnel.
- Maintain transparency and due diligence across the University's supply chains, procurement channels, and service vendors.
- Provide clear reporting mechanisms and whistleblower protections for individuals raising concerns regarding human rights violations.

2. SCOPE

This policy applies across all Constituent Colleges (Medical, Dental, Pharmacy, Biomedical Sciences), Departments, Research Centers, Healthcare Facilities, Hostels, and Administrative Units of JSS AHER.

It applies to:

- All employees (full-time, part-time, temporary, clinical, and visiting faculty).
- Contractual staff, third-party vendor employees, security personnel, housekeeping staff, and construction workers operating on university premises.
- Suppliers, contractors, service providers, and commercial partners across all university supply chains.
- Students, research fellows, and interns involved in university-led programs.

3. DEFINITIONS & PROHIBITED PRACTICES

JSS AHER strictly prohibits the following forms of exploitation:

- **Forced or Compulsory Labor:** Any work or service extracted from any person under the threat of penalty, coercion, or where the person has not offered themselves voluntarily.
- **Modern Slavery:** A state of bondage or control where a person cannot leave or refuse work due to threats, violence, coercion, deception, or abuse of power.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of people through force, fraud, or deception with the aim of exploiting them.
- **Child Labor:** The employment of children below the statutory minimum age specified by Indian law or employing young persons under hazardous working conditions.
- **Debt Bondage & Retainage of Identity Documents:** Restricting a worker's freedom of movement by withholding passports, government IDs, original certificates, or wage deductions to pay off forced debts.

4. CORE OBLIGATIONS & PREVENTIVE MEASURES

4.1 Ethical Employment & Workplace Standards

- **Fair Compensation:** All employees and contractual workers must be paid wages that meet or exceed statutory minimum wage laws set by the government, with full transparency in pay statements.
- **Voluntary Employment:** No worker shall be forced to work against their will or subject to excessive, uncompensated overtime beyond legal limits.
- **Freedom of Movement & Document Retaining:** JSS AHER prohibits the confiscation or withholding of original identification documents (e.g., passports, Aadhaar cards, educational degrees) of any staff or contractual worker as a condition of employment.

4.2 Supply Chain & Vendor Due Diligence

- **Contractual Mandate:** All contractors, service providers, suppliers, and construction agencies doing business with JSS AHER must formally agree to abide by this policy and relevant anti-slavery laws.
- **Vendor Screening:** Procurement teams must evaluate high-risk service contracts (such as housekeeping, catering, security, facilities management, and construction) for compliance with fair labor practices prior to contract renewal or award.
- **Audit Rights:** JSS AHER reserves the right to conduct unannounced audits or inspections of vendor operations on university premises to verify working conditions and compliance with labor standards.

5. GOVERNANCE & RESPONSIBILITIES

5.1 Ethical Labor Oversight Committee (ELOC)

To oversee the implementation and monitoring of this policy, JSS AHER establishes the **Ethical Labor Oversight Committee (ELOC)**, comprising:

- **Registrar:** Chairperson
- **Finance Officer:** Member
- **Dean (Academics):** Member
- **Dean (Research):** Member
- **Dean of a Constituent College / Faculty** (*Nominated by the Vice-Chancellor on rotation*): Member
- **Legal Officer / Administrative Officer:** Member Secretary

5.2 Committee Responsibilities

The ELOC shall:

- Review high-risk procurement contracts and vendor labor compliance reports.
- Conduct periodic reviews of labor practices and working conditions across constituent units.
- Investigate reported incidents or complaints related to modern slavery, forced labor, or vendor labor exploitation.
- Submit an annual compliance report to the Vice-Chancellor.

6. REPORTING, GRIEVANCES & WHISTLEBLOWER PROTECTION

- **Reporting Channel:** Any student, employee, contractual worker, or member of the public who suspects or observes modern slavery, forced labor, or labor exploitation at JSS AHER or within its supply chains may report the matter directly to the **Registrar** or the **ELOC**.

- **Zero Retaliation:** JSS AHER strictly prohibits retaliation against anyone who reports suspected violations of this policy in good faith. Reports shall be handled with appropriate confidentiality.
- **Corrective Action:** If a supplier or contractor is found to be in breach of this policy, JSS AHER will require immediate corrective action. Failure to remedy non-compliance will result in immediate contract termination, vendor blacklisting, and reporting to legal authorities.

7. ADMINISTRATIVE IMPLEMENTATION

Implementation of this policy is supported through standard vendor declaration forms, procurement clauses, and internal labor compliance audits managed by the Office of the Registrar, the Finance Officer, and the Deans of the respective constituent colleges.

8. DATE OF IMPLEMENTATION:

This policy will come into immediate effect 01.01.2025

9. DATE OF REVISION:

01.01.2027




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