NUML POLICY AGAINST FORCED LABOUR, MODERN SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR

Policy particulars

Item	Detail
Policy No.	NUML/HR/18/2025
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Approved by	Board of Governors
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Policy owner	Human Resources Branch
Next review	Two Years from 25 December 2025

1. Purpose

This policy sets out how NUML will keep forced labour, slavery, human trafficking and child labour out of its own workforce and out of the work done for it by others. It covers every campus and every contract.

2. Policy Statement

NUML does not accept forced or bonded labour, slavery, human trafficking or child labour in any form. Everyone who works for the University, or on its premises through a contractor, is entitled to freedom, safety and fair treatment. The University will not knowingly benefit from these practices or do business with those who do. By adopting this policy, NUML also contributes to UN Sustainable Development Goal 8, Target 8.7.

3. Definitions

- **Forced labour** means work or service obtained under threat of penalty, or that the person never freely agreed to do.
- **Bonded labour** means work demanded to pay off a debt or advance, where the worker is not really free to leave.
- **Modern slavery** is the general term for slavery, servitude, forced and bonded labour, and human trafficking.
- **Human trafficking** means recruiting, moving, housing or receiving a person through force, threat, fraud or abuse of their vulnerability so that they can be exploited.

- **Child labour** means employing anyone below the minimum age set in this policy, or putting anyone under 18 to work that can harm their health, safety, morals or schooling.
- **Worker** means anyone who does work for the University or on its premises: regular, contract, visiting, part-time and daily-wage staff, interns, assistants, and the employees of contractors and suppliers.
- **Contractor** means any firm or individual that supplies goods, services or manpower to the University.

4. Legal and Normative Basis

This policy draws on the following.

- Article 11 of the Constitution of Pakistan, which prohibits slavery, forced labour and the employment of children.
- Pakistan's laws on bonded labour, human trafficking and the employment of children, as they apply in the Islamabad Capital Territory *[Legal Adviser to confirm titles and years before publication]*.
- ILO Conventions 29 and 105 on forced labour, 138 on minimum age, and 182 on the worst forms of child labour.
- The UN Convention on the Rights of the Child, the Palermo Protocol on trafficking in persons, and the UN Guiding Principles on Business and Human Rights.
- The NUML Ordinance 2000 (as amended), the NUML Service Statutes, Estacode 2021 where it applies, and HEC regulations.

If this policy ever conflicts with the Ordinance, the Service Statutes or a binding law, those prevail.

5. Scope

The policy applies at the Main Campus, the Rawalpindi Campus and every Regional Campus. It covers all workers as defined above, all purchasing and outsourcing, and every route by which people are recruited for the University, including the hiring of foreign faculty and arrangements with international partners.

6. Commitments

6.1 Voluntary work. Nobody will be made to work for NUML through force, threats, intimidation or deception, or by holding back their pay or benefits.

6.2 Documents. NUML and its contractors will not keep a worker's passport, CNIC, degrees or other personal documents. If a document has to be checked, the original goes back to the worker the same day.

6.3 Fees and deductions. No one pays to get a job or to keep one. Nothing is deducted from wages except what the law, the Service Statutes or the worker's written terms allow.

6.4 Freedom to leave. Workers can leave by giving the notice their terms require. Notice periods and the study-leave or training bonds provided for in the Service Statutes are lawful and are not forced labour, as long as they are explained at the outset and never used as a means of pressure.

6.5 Written terms and pay. Before starting, every worker gets written terms in a language they understand, covering duties, pay, hours, leave and where to take a complaint. Pay goes straight to the worker, on time, and never below the legal minimum.

6.6 Minimum age. The University will not employ or engage any person below 18 years of age in any capacity, whether regular, casual, daily-wage or through a contractor. The CNIC or B-Form is checked before anyone is appointed or engaged.

6.7 Official staff and private work. A person appointed to a University post will not be sent to do domestic or personal work for any officer, employee or anyone else.

6.8 Recruitment. Hiring must be open and lawful, including when agents are involved. Foreign faculty, visitors and international students are covered by this policy and by the relevant University SOPs. NUML will not use a recruiter who charges workers or misleads them about the job.

6.9 Workers at greater risk. Special care will go to low-paid and low-skilled workers, migrant and seasonal workers, and those with limited literacy.

6.10 No retaliation. A person who raises a concern in good faith, or helps with an inquiry, must not be dismissed, demoted, harassed or otherwise disadvantaged for doing so.

7. Contractors and Procurement

7.1 Every outsourcing or purchasing contract, especially for security, sanitation, catering, transport, construction, maintenance and manpower supply, will carry a clause binding the contractor to this policy. The clause lets the University inspect records, speak to workers and terminate the contract for breach.

7.2 Contractors who supply manpower or labour-intensive services must sign the Contractor Declaration at Annex A before award and again at renewal. On request they must also show the University:

- the ages of their workers
- proof that wages were paid
- registration with the applicable social-security and old-age benefit schemes
- the written terms on which workers are engaged

7.3 The Director Administration, who looks after outsourced services, will keep a register of these contracts and check compliance once a year, more often for high-risk services.

7.4 A breach first brings a written notice with a deadline to put it right. Serious or repeated breach can lead to suspension, termination, forfeiture of security and blacklisting under the procurement rules. Where there is credible evidence of an offence, the matter goes to the law-enforcement authorities.

8. Roles and Responsibilities

Office	Responsibility
Board of Governors	Approves this policy and receives the annual report
Rector	Overall accountability; ensures implementation and resources; reviews the annual report
Director HR / HR Branch	Policy owner; verifies age and terms of appointment; maintains records; arranges training; maintains the case register
Director Administration	Ensures contractor compliance across outsourced services; maintains the contract register; conducts or arranges inspections
Procurement Section	Inserts the policy clause in tender and contract documents; obtains declarations
Finance Branch	Ensures timely payment of wages and contractor dues, and flags irregularities
Heads of Departments / Offices	Ensure no breach in their areas; report concerns promptly
Focal Person [designation to be notified]	Receives and logs reports; coordinates inquiry; reports to the Rector
All workers and staff	Comply with this policy and report concerns

9. Reporting and Grievance Redressal

9.1 Anyone can raise a concern with the Focal Person, the HR Branch, the grievance committee or the Rector directly, in person, in writing or at dir-hr@numl.edu.pk. Anonymous reports are NOT accepted.

9.2 The Focal Person acknowledges each report within three working days and arranges for a committee, independent of those involved, to look into it.

9.3 Inquiries are confidential and are normally completed within 30 days; the Rector may extend this for recorded reasons. The reporter's identity is protected as far as possible.

9.4 Depending on the findings, the outcome may be disciplinary action under the Service Statutes, action against the contractor, support for the affected worker, or referral to the law-enforcement authorities. Where needed, the worker will be pointed to the right agency for help.

9.5 This policy operates alongside the University's harassment policy / code of conduct policy.

10. Training and Awareness

The HR Branch will cover this policy in staff induction and hold a session at least once a year for HR, administration, procurement, finance and security staff and for contractor supervisors. The policy will be on the University website and notice boards, and every contractor will receive a copy.

11. Monitoring, Reporting and Review

11.1 The HR Branch will keep a register of reports, inquiries and outcomes. The Director Administration will keep the contractor compliance register.

11.2 Each year the Rector will receive a short report on the number of reports, inspections, training sessions and actions taken, and it will go to the Board of Governors.

11.3 The policy is reviewed every two years, or earlier if the law or an accreditation requirement changes. Only the Board of Governors can amend it.

12. Breach of This Policy

An employee who breaches this policy commits misconduct under the Service Statutes. A contractor who breaches it is in breach of contract, with the consequences set out in Section 7.4.

Annex A

CONTRACTOR DECLARATION

To be signed on the contractor's letterhead and submitted before award and at each renewal.

To: Director Administration, National University of Modern Languages, Islamabad

I/We, [name of firm / individual], contractor for [service], declare that:

1. I/We have read the NUML Policy Against Forced Labour, Modern Slavery, Human Trafficking and Child Labour and will follow it.
2. Nobody under 18 years of age works, or will work, for NUML under this contract.
3. Every worker is engaged voluntarily, on written terms, and is free to leave in line with them.
4. No worker pays a recruitment fee, deposit or unlawful deduction, and I/we hold no worker's identity documents.
5. I/We pay wages on time, directly to the worker, at or above the legal minimum, and our workers are registered with the applicable social-security and old-age benefit schemes.
6. NUML may inspect the relevant records and speak to workers, and I/we will tell NUML of any suspected breach.
7. I/We understand that a breach can lead to termination, forfeiture of security, blacklisting and referral to the authorities.

Name: _____ Designation: _____ CNIC: _____

Signature and stamp: _____ Date: _____