Modern Slavery and Human Trafficking Statement 2019/20

Introduction

This Statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).

The University's Financial Regulations, Procurement Policy and Procedures and Ethical Investment Policy state our commitments to the highest standards of ethical conduct in all our activities, along with making continuous improvements in this area. The University does not engage in, or condone, the practices of human trafficking, slavery or forced labour.

As a values driven institution, our values underpin all that we do. We promote a community where all individuals matter, where wellbeing is paramount and pastoral care is of the highest quality, where we are driven by our pursuit of social justice and the common good, and where people, the planet, and all living things are held in the highest regard. We are committed to improving our business practices to combat modern slavery and human trafficking and to ensure that we are not complicit in any human rights violations. We are committed to zero tolerance of slavery and human trafficking or child labour practices.

Structure of the University

University of Winchester is a registered limited company (company number 05969256) and an exempt charity under the terms of the Charities Act 2006, and as such it is required to have charitable purposes and apply them for the public benefit. It must comply with the general law of charity. Members of the Board of Governors are charitable trustees.

The University is organised into four faculties: Arts; Humanities and Social Sciences; Business, Law and Sports; and Education, Health and Social Care. We have over 1,000 employees and educate over 7,000 undergraduate and postgraduate students at any one time. Our annual turnover is in excess of £70 million, and whilst our key expenditure is on our academic and administrative staff, we engage with a large number of national and some international suppliers to provide us with goods and services.

Our supply chains

The University’s supply chains predominantly fall within the following categories:
- Estates and facilities management (works, services and goods)
- ICT equipment and services
- Professional services
- Teaching materials

The University is a member of the Southern Universities Purchasing Consortium (SUPC) which has also published its own Modern Slavery Statement. We channel in excess of 30% of the value of our addressable spend through SUPC and other agreements arranged by higher education and public sector purchasing consortia or frameworks. The particular business and supply chains which may pose particular risks in terms of slavery are in IT and AV equipment, construction, and uniform/clothing supplies.

Our campus services are almost entirely in-sourced and the University has made a commitment to honoring the Living Wage for all our employees, full time or fractional.

**Our policies**

We are committed to making sure that there is no modern slavery or human trafficking in our supply chain or in any part of the University’s business. We continue to develop our policies and procedures to reflect our commitment to acting sustainably, ethically and with integrity in all our business relationships. We are working to develop, implement and enforce effective procurement systems, processes and controls to make sure child labour, slavery and human trafficking is not taking place within our supply chains.

We expect all of our suppliers to respect and treat employees in a morally and ethically appropriate manner. Our suppliers are expected to take steps and demonstrate a commitment to making sure that their own supply chain is free from child labour, modern slavery and human trafficking. However, the University has put in place a number of measures and policies to ensure compliance with the Modern Slavery Act 2015.

We have developed Financial Regulations and Procurement Policy and Procedures that reflect our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce systems and controls to ensure our values are instilled within our purchase to pay cycle.

Our RKE Ethics Policy and Procedures is active and managed by the University RKE Ethics Committee. The policy describes how the University’s values are embodied in the conduct of our research and knowledge exchange and makes explicit the requirement for ethical conduct by staff and students.
The University mitigates the risk of modern slavery occurring in its workforce by ensuring that directly employed staff are recruited by following robust HR recruitment policies. There is a whistleblowing policy in place for members of staff to raise any concerns about wrongdoing by the University. Staff employed on a temporary staff basis via agencies are only recruited through established sources who can provide assurance that they comply fully with the requirements of legislation relating to the rights and welfare of their candidates and employees.

Our Ethical Investment policy has been developed to reflect our commitment to ensuring that our investments are not complicit in any human rights violations, in so far as possible. To this extent the University does not knowingly invest directly or indirectly in organisations that breach human or animal rights or that are in breach of the Modern Slavery Act 2015.

**What we accomplished in 2018/19**

During the year to 31 July 2019 we implemented a number of new initiatives to strengthen our recognition, reporting and avoidance of modern slavery and human trafficking which included the following:

1. We have formalised our Procurement capability with a Procurement Manager (Ethical Procurement). The postholder is also our Modern Slavery Act ‘champion’ at the University and has started to transform the existing Procurement function into a best in class operation that is fully aligned with the University’s values, embedding processes for identifying modern slavery and human trafficking supplier risks;

2. We undertook a review of our key risk areas in our business and in our supply chains and have since implemented a number of improvements to our policies and processes including implementing various checks and assurances into our procurement and contract review procedures;

3. We have undertaken a risk assessment of our top 25 suppliers to identify any high risk suppliers in our supply chain.

**What we are going to do in the future**

Our policies and procedures are subject to an ongoing review to further embed the principles of modern slavery and how it can be recognised, reported and avoided. Over the coming year the University will continue its improvements to include:

1. Further risk assessment of lower spend and new suppliers;
2. Supplier tender documentation review to further embed modern slavery and human trafficking safeguarding;

3. Investigate training opportunities for University staff to raise an awareness and understanding of modern slavery and human trafficking and how to report it;

This statement will be reviewed annually.

[Signature]

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Vice-Chancellor
University of Winchester, December 2019