

University of Warwick

Modern Slavery Act 2015 – University Annual Statement Financial Year ending 31st July 2021

Introduction

Modern Slavery is a term used to encapsulate offences defined in the Modern Slavery Act 2015 covering slavery, servitude, forced or compulsory labour and human trafficking. Business organisations (universities are included within this definition) have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. The University of Warwick fully accepts these responsibilities and is committed to meeting its obligations under the Modern Slavery Act. The University publishes an annual statement setting out the steps it has taken to manage effectively the risk of modern slavery existing within either the University or its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 July 2021.

Raising Concerns

All members of the University are responsible for reporting concerns they may have of potential breaches of the University's Modern Slavery Policy (see below) as soon as possible, whether on the part of other University members or third parties. Concerns may be raised directly with Heads of Department / Centre / Activity in the first instance or, where this is not felt to be appropriate, to the Secretary to Council. The [University's Whistleblowing Code of Practice](#) also permits staff, students and anyone contractually associated with the University to raise concerns of serious malpractice in the University. Heads of Department / Centre / Activity or their representative must report any suspected breaches of the Modern Slavery Act to the Secretary to Council.

About the University

The University of Warwick is one of the UK's leading universities, with an acknowledged reputation for excellence in research and teaching, for innovation, and for links with business and industry. The University has around 7,000 employees. The University recruits students and staff from around the world in pursuit of academic excellence and it has many international links within the higher education sector and with commercial and other organisations.

This Annual Statement is made on behalf of the University group, including all our subsidiary and associate companies. The University turnover in 2020/21 was £704m. None of our subsidiary or associate companies have a turnover in excess of £36m and so are not required to publish their own separate statements. All of our subsidiary and associated companies are registered in the UK.

Our Supply Chains

The highly-varied activities of a large, multi-disciplinary University necessitate the management of a diverse supplier base. For the purpose of this annual statement, the University defines its supply base as providers of goods, services or works for which the contracting arrangements are governed by the University's Financial Procedure for Purchasing, which seeks to ensure transparency of process and achievement of best value.

The University's supply base spans several broad category areas including: Construction, Laboratory Equipment, Catering, Professional Services, ICT, Facilities Management and Laboratory and Office Consumables. Across these categories, the University engages with a range of suppliers including large corporations and SMEs, both locally and internationally. It is recognised that the risk of Modern Slavery occurring will vary across these supply categories and the level of risk may also be impacted by a supplier's size and location. For example, it is considered that larger UK registered suppliers, having a turnover in excess of £36m, may represent a lower risk of breaching the Modern Slavery Act as they themselves must publish an Annual Statement, and this might reasonably be expected to raise awareness and drive compliance with the Modern Slavery Act in those organisations and their supply chains. The University therefore adopts a risk-based approach to mitigating the risk of Modern Slavery in its supply chain.

Compliance Work Undertaken in 2020/21

The University continues its communications programme to raise awareness of Modern Slavery and Human Trafficking through the staff refresher course on the Procurement Financial Procedure which runs twice yearly. A further Modern Slavery and Human Trafficking refresher session has also been delivered to senior Finance Office staff.

Across the first tier supplier base, approved suppliers are encouraged to register on our third party supplier engagement tool (NETpositive Futures Ltd), complete impact assessments and create action plans to improve their own supply chains across a range of corporate social responsibility considerations, including awareness of Modern Slavery and Human Trafficking. Circa 74% of approved suppliers have created action plans using this system, up from 60% during the previous period.

Newly appointed approved suppliers awarded contracts via a competitive tender within the period will have returned a satisfactory Modern Slavery and Human Trafficking declaration confirming compliance to the University's requirements and expectations.

Procurement Office staff continue to receive any sector updates for example via the Higher Education Procurement Academy (HEPA) or consortia.

Modern Slavery Policy

The University is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of our organisation. We have developed a University Policy in response to the Modern Slavery Act 2015, which may be viewed at the link alongside this document.

In addition to our Modern Slavery Policy, the University has a suite of policies which support the protection of University members and third parties, demonstrate our values and underline our commitment to meet our public responsibilities, including the following:

- Dignity at Work and Study Policy
- [Our Guiding Principles](#)
- Child Protection Policy
- Health and Safety Policies

In respect of Health and Safety, we have a code of conduct which contractors engaged by the University must adhere to. This includes a range of provisions to ensure that workers are protected and their rights are enforced, including the requirements that contractors must: (i) Satisfy themselves that they and anyone they employ or engage are competent and adequately

resourced; (ii) Plan, manage and control their own work to ensure any workers under their control are safe from the start of their work on site, and (iii) Provide workers under their control with any necessary information they need to work safely, report problems and respond appropriately in an emergency.

The University also operates a Socially Responsible Investment Policy. We will use all reasonable endeavours to ensure that we operate our investment policy in a way that is consistent with a range of socially responsible aims, including the need to reduce and ideally eliminate corporate behaviour leading to the exploitation of workers.

Our Future Plans

In respect of our supply chain, the University plans to build on the steps already undertaken and will continue its commitment to reducing the risk of Modern Slavery occurring.

We will continue to monitor supplier base engagement with the NETpositive Futures Ltd Supplier Engagement Tool with the aim for all approved suppliers to have completed an impact assessment and be working towards an action plan. Where outstanding suppliers are themselves subject to the specific obligations of the Modern Slavery Act, we will gather appropriate evidence of their own Modern Slavery Statements as an alternative.

We will continue to monitor our tender documentation to ensure it remains robust and will incorporate any improvements or adjustments as may be considered appropriate throughout the period.

The training needs of Procurement staff will continue to be monitored in order to identify opportunity for further skills development, in particular keeping abreast of guidance or training which may be available through the Higher Education Procurement Academy (HEPA) or at a consortia level.

We will continue to raise awareness of Modern Slavery and Human Trafficking and the obligations set out under the Act through different media for example our website, staff forums and assurance documentation.

As the focus of our response to the Modern Slavery Act is primarily on our supply chain, this work will be led by our Head of Procurement and Insurance Services, reporting through the University Executive Board (via the Group Finance Director) to the University Council. Support from other professional specialisms, such as Legal and Human Resources, will be sought where appropriate.

Andrew Smith – Finance Director