

University of Warwick

Modern Slavery Act 2015 – University Annual Statement 2016/17

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 2017.

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 6,000 employees who are mostly based at our main campus in Coventry and Warwickshire. 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 2016/17 was £591M. 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, with the exception of Warwick University Enterprises (Australia) PTY Ltd, which is registered in Australia.

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 will therefore be developing a risk-based approach to mitigating the risk of Modern Slavery in its supply chain.

Compliance Work Undertaken in 2016-17

The University has continued its communications programme to raise awareness of Modern Slavery and Human Trafficking and the obligations set out under the Act. Through staff forums awareness building sessions have been delivered to staff across academic, administrative and commercial areas, particularly reaching those involved in the procurement process.

The University's General Terms and Conditions of Purchase have been updated to incorporate robust anti-slavery clauses and bring contractual clarity to our expectations of suppliers with regard to the Act. These clauses have also been included in our service specific standard consultancy terms. Further work will be undertaken in 2017-18 to incorporate these terms into our High Value Laboratory Equipment terms in order to bring consistency across all of our "boilerplate" terms.

Initial steps have been taken to develop a risk-based approach to our supply chain. A review of categories has been undertaken, classifying spend areas according to perceived risk of Modern Slavery or Human Trafficking and spend thresholds. Those areas identified as having a higher risk, (for example uniforms, food, electronic components) will be prioritized for further risk assessment and supplier assurance as appropriate.

To support this approach, the University has considered several options to aid engagement with our supplier base. The NETpositive Futures Ltd supplier engagement tool has been selected as the most appropriate solution. This tool addresses Modern Slavery risks and wider sustainability considerations, supporting suppliers in identifying the positive and negative impacts of their operations and developing bespoke action plans which can be incorporated into ongoing contract management and supplier performance reviews, where appropriate. This system will be purchased and implemented within Financial Year 2017-18.

Building on the formal training received by Procurement Office staff in the previous period, the team continues to receive sector updates for example via the Higher Education Procurement

Academy (HEPA) or consortia. Additionally new members of the Procurement Office have received awareness training of the obligations under the Act and the University's whistle-blowing policy.

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
- 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. In particular, we will prioritise scrutiny of the supply base in those areas considered to pose a higher risk and will aim to conduct further analysis in at least three of these areas. This may involve activities such as working with suppliers to undertake specific risk assessments or developing specific action plans, removing supplier accounts from the University's procurement system or undertaking further assurance work as appropriate.

We intend to implement the NETpositive Futures Ltd Supplier Engagement Tool to support this activity.

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. Additionally, we will work to embed the updated anti-slavery clauses into the full suite of our terms and conditions documentation.



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 mediums 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. The University's Annual Statement on Modern Slavery has been reviewed by Internal Audit prior to receiving approval by the University Council.