

UNIVERSITY OF CUMBRIA

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

July 2017

INTRODUCTION

This statement sets out the University of Cumbria's position on modern slavery, its understanding of the risks and implications, and the steps that it is taking that aim to mitigate the risks and ensure that slavery and human trafficking do not exist within the University or within its supply chains.

As a provider of Higher Education, the University of Cumbria recognises its responsibility to take a robust approach to slavery and human trafficking. The University is committed to ensuring that there is no slavery or human trafficking in any part of the organisation or in its supply chains. In line with its mission statement and objectives, it is committed to acting ethically and with integrity in all its corporate and business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

This statement relates to the financial year 2016/17.

1. Organisation's structure

The University of Cumbria is a Higher Education Institution based in the north west of England, with campuses in Carlisle, Ambleside and Lancaster. It also has a campus in London. The University operates interests and activities from other smaller sites in the north west and elsewhere in the UK through partnership and collaboration arrangements with education providers and other organisations.

The University of Cumbria is a company limited by guarantee and a registered charity.

The overall responsibility for the strategy and control of the University of Cumbria rests with the University Board. The Board approves budgets and expenditure, and determines the educational character and objectives of the institution, as well as ensuring the effective and efficient use of the university's resources.

The strategic and operational management and day-to-day running of the University is the responsibility of the University Executive Group, under the leadership of the University Vice-Chancellor. The University Executive Group reports to the University Board through the Vice Chancellor

2. University of Cumbria policies, processes and procedures on slavery and human trafficking

The University has policies and procedures relating to anti-slavery and human trafficking embedded within its standard operational policies and

procedures. We propose to now link these together into a corporate Anti-Slavery and Human Trafficking Policy.

The University's Anti-Slavery and Human Trafficking Policy and Procedures will reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place in our employment procedures or supply chains.

2.1 Recruitment of University Employees

The Student and Staff Services Directorate is responsible for the oversight, management and risk assessment of the recruitment and appointment of University staff, under the leadership of the Director of Student and Staff Services and reporting to the Chief Operating Officer.

Policies, processes and procedures are in place to support the HR activities in order to:

- Mitigate the risk of slavery and human trafficking occurring within the University by ensuring full compliance with UK Visas and Immigration (UKVI) "right to work" checks;
- Monitor and address any emerging issues of concern;
- Protect those raising concerns about possible instances of slavery and human trafficking.

Relevant University Policies, Processes and Procedures include:

- Staff Recruitment and Selection Policy Statement
- Code of Conduct for Employees
- Public Interest Disclosure (Whistleblowing) *Policy*

These policies are available on our website.

2.2. University supply chains

The University's Procurement Team is responsible for the oversight, management and risk assessment of suppliers and contractors, reporting to the Director of Finance & Resources.

University supply chains include:

Laboratory Consumables and Equipment
Science and Medical Goods and Services
Professional Services
ICT Equipment and Services
Estates Goods and Services
Office Supplies and Services

In the financial year 2016/17, total non-pay spend by UoC was £23.7m, of which £13.3m was defined as "Impactable" spend from a supplier base of 1096 (TC) companies.

2.2.1 Due diligence processes for slavery and human trafficking in supply chains

Processes and procedures are in place to undertake due diligence on potential high-risk suppliers and conduct regular reviews of existing suppliers in order to:

- Identify and assess potential risk areas in University supply chains.
- Mitigate the risk of slavery and human trafficking occurring in University supply chains.
- Monitor potential risk areas in University supply chains.
- Protect whistle blowers.

In 2017/18 we plan to extend this process to include risk identification in respect of slavery and human trafficking.

Currently the University spends almost 39% (monetary value) through consortia frameworks including the North West Universities Purchasing Consortium (NWUPC), which is itself is a member of Procurement England Ltd (PEL) and UK Universities Procurement Consortia (UKUPC), bodies dedicated to improving both the quality of procurement and the level of collaborative procurement across the HE sector. NWUPC are committed to working with their suppliers to remove modern slavery from their supply chains. Included in this work they are collating information prior to tender award on first and second tier supply chain and then working with the suppliers post contract to encourage them to look beyond their statements and conduct robust analysis of their supply chains to identify areas of risk. Following this they will be working with them to see how they are dealing with this risk and what assurances can be implemented to redress this.

2.2.2 New suppliers

Appointment of new suppliers will take account of:

- Identifiable risks associated with a particular product or geographical area of origin;
- The general reputation of the supplier in terms of slavery and human trafficking risks;
- Drawing the supplier's attention to obligations within the contract with regard to slavery and human trafficking.

2.2.3 Review of suppliers and adherence to University values

The University exercises zero tolerance to slavery and human trafficking. To ensure all those in the University's supply chain comply with University values provisions to ensure supplier compliance are in place, including:

- The University has made all its suppliers aware that the Modern Slavery Act 2015 may be a consideration for their business.
- A range of potential actions has been communicated with all the University suppliers that will support the University's supply chain in responding to the principles of the Modern Slavery Act 2015.
- For all new tendered contracts, we require suppliers to confirm compliance with the annual reporting requirements of s54 of the Modern Slavery Act 2015.
- All suppliers are encouraged to register with the University's sustainability tool, 'Net Positive', to ensure that they comply with anti-slavery and human trafficking legislation.
- All high risk suppliers are expected to complete an Action Plan using the Net Positive Tool.

- The University will work with high risk suppliers to ensure they are compliant with anti-slavery and human trafficking legislation.
- All suppliers will be monitored and any concerns discussed with through the supplier contract management process.

3. Risk Assessment and High Risk Activities

The University has identified the following activities as high risk in terms of slavery and human trafficking:

- Employment of non-UK nationals on foreign visas
- Overseas suppliers
- Suppliers with whom the University has no previous history or knowledge
- Suppliers of goods in areas carrying material risks, including:
 - Office supplies
 - Laboratory consumables
 - ICT and AV equipment
 - Some estates services such as cleaning and security services.

4. Training and Awareness Raising

To ensure a high level of institution-wide understanding of the risks of modern slavery and human trafficking in University business and supply chains, the University is committed to delivering training to targeted staff including contract managers and HR staff. Training will include:

- Basic principles of the Modern Slavery Act 2015;
- Assessing the risk of slavery and human trafficking across the University's business;
- Overview of relevant University policies, processes and procedures
- Overview of University procurement and purchasing processes and practices and the prevention of unrealistically low price purchases, use of low-wage labour, provision of products by unrealistic deadlines;
- Identifying signs of slavery or human trafficking;
- What action to take when concerns about potential or suspected instances of slavery or human trafficking arise, and to whom within the University concerns should be escalated;
- Raising awareness and offering guidance around developing and implementing slavery and human trafficking policies with suppliers, contractors and partners;
- Measures that should be taken with suppliers or contractors who do not comply with requirements regarding slavery and human trafficking policies;
- Available external help and advice, eg. Modern Slavery Helpline;

As well as training targeted staff, the University will raise awareness of modern slavery issues by including information and guidance in manager briefings/other cascading channels and the circulation of information to all staff by email.

5. Measuring Effectiveness – Key Performance Indicators

During 2016/17 we have increased awareness of modern slavery and human trafficking in our staff and our supplier base. Due to organisational changes we have not made the progress that we hoped for this year, however progress has been made and we feel confident that the foundations that we have laid will enable us to make significant developments in 2017/18.

In 2017/18 we aim to:

- Provide training to all relevant University of Cumbria HR staff and contract managers
- Increase the use of the Net Positive engagement tool in our high risk suppliers

6. Next steps

Following a review of the University's current processes and areas identified for development and improvement in the context of available guidance on the legislation, the University intends to implement measures as outlined in this statement to combat slavery and human trafficking and ensure that there is no slavery or human trafficking in the University or its supply chains

7. Approval and Signature

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the University Board of Directors. It constitutes the University of Cumbria's Slavery and Human Trafficking Statement for the financial year ending 31st July 2017.

Signed by:



Designation: Chair of the Board of Directors

Date: 16 NOVEMBER 2017