



Slavery and Human Trafficking Statement – 2023-24

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The University of Worcester is committed to ensuring that slavery or human trafficking is not taking place in any part of our business or any part of our supply chain.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the University of Worcester's slavery and human trafficking statement for the financial year ending 31st July 2024.

This statement details the University's response to the Modern Slavery Act 2015 and offers an outline of the key areas where slavery and human trafficking are deemed a higher risk area as part of the University's business and its supply chain.

Organisational Structure

The University of Worcester is a Higher Education Corporation created by statute and is an exempt charity. The University also has a number of trading subsidiary companies: UW Developments Ltd, UW Enterprises Ltd and UW Worcester Wolves Ltd.

The University has approximately 9000 students from both the UK and around the World. We directly employ approximately 2000 staff and have an annual income of just below £100m.

The University has relationships with educational organisations in other countries through which it operates teaching partnerships and research and exchange programmes.

Our academic provision broadly comprises:

- Health and Life Sciences (including Nursing and Medicine)
- Education
- Science
- Business, Law, Computing
- Arts and Humanities

Our Supply Chain

The University of Worcester is one of the largest purchasers in the county of Worcestershire and recognises that it has a responsibility to minimise the environmental and social impact of purchased goods and services. The University purchases a wide range of external goods and services in support of our activities. The University has identified the following specific categories as being a higher risk to modern slavery and human trafficking within the supply chain:

- Construction works sub-contractors and supply chains
- Estates; hard and soft facilities management services (such as maintenance, cleaning and security services)
- Food and catering
- Travel and accommodation (especially international)
- Office supplies/stationery
- ICT and Audio Visual (AV) equipment and products
- Laboratory and Personal Protective Equipment (PPE) supplies
- Clothing (sportswear and work wear)

The University has in place a number of frameworks which underpin its ethical standards across all business activities, these include a Sustainable Procurement Policy, Fairtrade status and Environmental Policies.

The University is a member of the Northwest Universities Purchasing Consortium (NWUPC) which is a membership-based buying consortia for Universities and some Further Education Colleges. NWUPC is a member of Procurement England Limited (PEL) which has a shared Sustainability Policy to which all consortia are committed. The University can also purchase from various other consortia including Crown Commercial Services (CCS), Eastern Shires Purchasing Organisation (ESPO), Crescent Purchasing Consortium (CPC) and various NHS frameworks, these consortia have all published their own Modern Slavery Statements.

The NWUPC is an affiliate member of Electronics Watch, on behalf of its members. This membership highlights the overall desire of the HE sector to protect the rights of workers within the supply chain, and that we are committed to taking positive action. A significant proportion of the University's demand for ICT equipment/products is fulfilled by using national framework agreements. The consortia work closely with Electronics Watch to monitor contracts closely to ensure that slavery and human trafficking is not taking place within the supply chain.

The majority of the University's demand for office supplies and laboratory consumables is fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia. A wide range of products is procured across all of these categories, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. The Consortia requests many of the suppliers in these high-risk areas to commit to the Base Code of the Ethical Trading Initiative (ETI) and is working to persuade all suppliers in these categories to commit to the Base Code.

In order to meet our obligations under the Modern Slavery Act the University utilises NETpositive Futures, this is an on-line assessment tool that allows the University to engage directly with all of our suppliers to identify their awareness of modern slavery and human

trafficking. All of our suppliers have been contacted to encourage them to sign up to this free HE sector-wide tool. The tool actively assists our suppliers to develop an action plan that addresses modern slavery and other key sustainability issues within their businesses and supply chain. Data provided via NETpositive is a rich source of information to use to help us understand our supply chain. The tool is regularly being developed to align with Universities' requirements, this includes reporting on Carbon emissions and reporting on Sustainable Development Goals.

Training and awareness raising

Within the Procurement Team, as the area most actively engaged in the University's operational response to the Modern Slavery Act 2015, all members have undergone training. Ongoing collaboration is sought within the HE sector on best practice. The University will continue to ensure that those who are involved in activities in which modern slavery and human trafficking could be an issue will continue to receive support and training, the University will continue to raise awareness across the organisation.

Members of the Procurement Team have delivered lectures to students within the Business School to raise their awareness of sustainability issues arising within the supply of goods and services into the University of Worcester.

All staff are required to undertake mandatory training every other year on Health and Safety and Equality, Diversity and Inclusion. Training is also provided to relevant staff on Safeguarding.

Our Policies relating to slavery and human trafficking

We operate and regularly review our policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

Relevant policies to slavery and human trafficking, ordered alphabetically, are:

[Admissions Policy \(Updated January 2024\)](#)

The Policy relates to the admission of new students. It includes specific information for international students regarding deposits and Confirmation of Acceptance of Studies (CAS); admission of under 18 year olds; admission of applicants who have spent a period in Care; admission of applicants with criminal convictions.

[Equality, Diversity and Inclusion Policy Statement \(Published 2022\)](#)

The Policy Statement sets out the University's commitment to creating an environment free from discrimination, bullying, harassment or victimisation, where all members of the community are treated with respect and dignity.

[Health & Safety Policy Statement \(Published 2022\)](#)

The Policy Statement sets out the University's commitment in creating a safe and healthy workplace and environment for all staff, students, and visitors.

[Right to Work Policy & Procedure \(published August 2023\)](#)

The Policy and Procedure apply to all new staff joining the University and requires right to work checks to be undertaken before an individual can commence work with the University.

[Safeguarding \(Students, Children and Vulnerable Adults\) Policy \(Updated September 2023\)](#)

The Policy outlines the key principles that the University holds in the context of safeguarding children and vulnerable adults. The Policy applies to all staff and students at the University and contractors working at the University.

[Whistleblowing Policy \(Updated March 2024\)](#)

The Policy encourages staff to report suspected wrongdoing or malpractice as soon as possible and to ensure that staff feel confident that they can raise any genuine and legitimate concern without fear of reprisals, even if they turn out to be mistaken.

Due Diligence Processes for slavery and human trafficking

We have the following arrangements in place as part of our initiative to identify and mitigate risk:

Supply chain

The Procurement Team are responsible for identifying, monitoring and mitigating areas of potential risk, including the risk of slavery and human trafficking. To ensure suppliers are aware of our values, tender documents and standard Term and Conditions include clauses supporting our commitment to protecting human rights in our supply chain. The University has updated its standard Terms and Conditions to mandate compliance to the Modern Slavery Act 2015.

Suppliers are required to declare their compliance with the Act. The documents provide provisions to terminate the contract should a supplier be found to be in breach of the conditions outlined.

Students

The University has strict arrangements in place for the admission of students as set out in the Admissions Policy. This includes arrangements for under 18 year olds, those from a Care background, international students and those with criminal convictions.

On arrival there are specific arrangements to support under 18 year old students and international students, including ensuring attendance.

Through its Student Services provision the University also offers a wide range of support to all students including financial advice and short-term funding; careers and job advice; counselling; general support and advice. The International Team also provide specific support and advice for international students.

Staff

The University has strict arrangements in place to ensure all staff complete a Right to Work check before they are allowed to start work with the University.

Staff are required to undertake mandatory training on Equality, Diversity and Inclusion and Health and Safety every two years and further training is provided on Safeguarding for relevant staff.

Actions taken during the reporting year

In addition to the day-to-day work outlined in this statement during the reporting year we have:

- Formalised the reporting of the Modern Slavery Statement by the Board of Governors, through its People & Culture Committee.
- Broadened the scope of the Modern Slavery Statement beyond the University's supply chain including information about staff recruitment and student recruitment and support.
- Relocated responsibility for the Modern Slavery Statement more centrally, with it now primarily resting with the University Secretary.
- Widened membership of the Sustainable Procurement Steering Group.
- Encouraged and expanded the use of Framework Agreements to benefit the work being completed by purchasing consortia in this area, e.g. affiliation with Electronics Watch.
- Continued to encourage supplier engagement with NetPositive's Supplier Engagement Tool.
- Reviewed appropriate use of scoring in the award of tenders.
- Attended and contributed to the North West Universities Purchasing Consortium meetings and their ongoing commitment to sustainable collaborative procurement.
- Continued engagement with Higher Education Procurement Association (HEPA)/ British Universities Finance Directors Group (BUFDG)/ UK Universities Purchasing Consortia (UKUPC) to ensure sector alignment on Modern Slavery.

Plans for the future

In the financial year 2024-25 we plan to:

- Review the location of the published Modern Slavery Statement on our website to ensure it is accessible.
- Undertake a risk assessment of relevant arrangements in the context of slavery and human trafficking and identify any areas where further work may be required including awareness raising.

- Continue to better understand our supply chains and work towards greater transparency.
- Continue to promote the use of the framework suppliers and lobby via the purchasing consortia to ensure all suppliers have stated anti-slavery and anti-trafficking policies and procedures.
- Ensure all contracted suppliers have signed up to, and are complying with, our Terms and Conditions which include commitments relating to the Modern Slavery Act 2015.
- Continue to encourage supplier engagement with the NETpositive Supplier Engagement Tool.
- Protect whistle blowers.

Approved by the: Board of Governors

Dated: 21st November 2024