

Modern Slavery Act Transparency Statement

University of Exeter

Financial Year 2015-2016

Introduction

At the University of Exeter (“the **University**”), we are committed to protecting and respecting human rights and do not tolerate slavery, human trafficking and other exploitation. This statement complies with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the University has taken regarding slavery and human trafficking.

The University of Exeter

The University combines world class research with excellent student satisfaction at its campuses in Exeter, Devon and Penryn and Truro, Cornwall. Formed in 1955, the University has 21,273 students from more than 130 different countries. Its success is built on a strong partnership with its students and academics and a clear focus on high performance.

Policies

As already noted, the University is committed to protecting and respecting human rights and has embodied this ethical stance in a number of its policies, including:

- The University Ethics Policy
- Professional Code of Conduct:
- Dignity and Respect
- Good Practice in the Conduct of Research

The University has several policies that set out standards for procurement and suppliers. These include:

- Sustainable Procurement Policy This includes our policy on conflict minerals.
- Chartered Institute of Purchasing and Supply (CIPS) Code of Conduct. Most of our strategic procurement officers are members of CIPS, the professional association. As members, they must comply with this code, which includes adherence to laws, ethics and personal integrity.
- Fair Trade policy
- Sustainable Food Policy

Procurement

Supply Chain. In Financial Year 2015/16, the University spent £101 million with 4500 suppliers, with another £3 million on purchasing cards for one-off expenditure. Procurement above circa £160,000 was managed by Procurement Services, and below that mostly by the Colleges and Professional Services Teams.

Almost all supplier expenditure was with first tier suppliers who have registered addresses in the UK, and we have relatively few outsourced services.

Risk

Our initial risk assessment this year is an outline. The University has undertaken a high level risk assessment to identify the potential sectors and suppliers where issues around human trafficking have historically arisen including:

- Supply of clothing/ uniforms
- IT industry, including computers, tablets, and mobile phones
- Agency Workers;
- Construction industry

Clothing: The University does not have a significant volume of purchasing from the clothing sector. Most members of staff do not wear a uniform. Having considered our supply chain we have assessed the risk to be low.

IT: The University purchases a wide range of electronic and IT equipment and software. Some of those items, particularly laptops, mobile phones and tablets can contain metals usually sourced in high-risk regions and the University is aware there is a well-documented risk of dangerous working conditions and child labour. However, the University's main supplier of laptops and desktop computers is HP, who monitors its supply chain closely.

Agency Workers: The University has identified there is a potential risk with agency staff for cleaning roles. The University has identified there may be small amounts of procurement being undertaken outside of Procurement Services. The use of agency workers is quite limited and normally undertaken via existing university sector frameworks. Where agencies are used on a one-off basis these tend to be UK based and registered businesses.

Construction: Most construction is carried out by major companies, which perform much of their work through their contractors. However, most of our building contractors abide by the Considerate Contractor [code of conduct](#) which includes a commitment to the well-being of the site workforce.

In terms of procurement, also see below the statements regarding Terms and Conditions and contractual arrangements.

Training

The University arranged training on the Modern Slavery Act, and the issue of human trafficking/ethical procurement for its strategic procurement officers. The intention is that this training will be available on an annual basis and will be extended to all strategic procurement staff and other senior personnel involved with operational procurement.

Procurement and Contractual Due Diligence

The University has undertaken a review of its procurement templates, including the Selection Questionnaire and tendering documentation to ensure these are in line with regulatory requirements around modern slavery.

The University has also engaged with a number of procurement consortium including the Southern Universities Purchasing Consortium (SUPC) to ensure they too are applying similar measures to their procurements and framework agreements.

The University has updated its standard terms and conditions for purchasing of goods, works and services to include an obligation to comply with the Modern Slavery Act and to pass this down to any supply chain.

Identifying Instances of Modern Slavery in Supply Chain

The University has not identified any instance of a breach of the Modern Slavery Act in its supply chain.

Additionally, the University is of the view that a breach of the Modern Slavery Act would be a material breach. In a scenario where the University identified any instance of modern slavery in its supply chain, it would seek to take action in accordance with due process. Actions would include: informing the police (for the most serious instances), terminating a contract, or the development of improved conditions for the affected workers (least serious).

The University has also started category management, which it is envisaged will give a greater granularity of detail regarding categories of expenditure (particularly focussing on IT infrastructure, construction, cleaning and catering). This will enable the University to reduce its supplier base and have greater scrutiny of these suppliers and their supply chain.

Where staff have concerns with regard to potential breaches of the Modern Slavery Act, these can be raised directly with the University's Procurement Manager, who can be contacted via the following e-mail address: k.a.hill@exeter.ac.uk

Monitoring and auditing

The University does not have the resources to audit its supply chain to second, third (and lower) tiers, so we intend to collaborate with others in the Higher Education sector. The University has reviewed and tried one service for monitoring corporate social responsibility (CSR) for suppliers, but this seemed undeveloped and unsuited for our needs.

The University has identified other potential options which there will be the opportunity to try through the license agreement expected through our purchasing consortium (SUPC). Other potential services are also being explored.

The University is also undertaking analysis to give a better understanding of procurement expenditure. This currently covers first tier suppliers but it is intended this will be extended.

Category management

Finance and Procurement Systems

The University has commissioned new finance and procurement systems in late 2015 and early 2016 which it is intended will formally "go live" in August 2017. These systems will:

- improve the visibility of our chosen suppliers and contracts so members of staff can select goods and services from approved suppliers;
- provide greater clarity and auditable detail regarding how we identify and procure our suppliers and contractors;
- our management of suppliers by reducing their number;
- our management of supply categories and their risks.

HR Statement

The University directly employs circa 4686 employees and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce.

Our Human Resources (HR) directorate and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees have to provide 'right to work' information which is checked at interview. The majority of interviews are conducted face-to-face which ensures that individuals have freely chosen to attend. All application forms are verified as being the applicant's own information, including taking a copy of the interviewee's original passport and any additional 'right to work' documentation (where applicable).

Where interviews are conducted via Skype or other electronic means, the candidate is required to present their original passport and other additional 'right to work' documentation (where applicable) in person to HR before their start date or on their first day.

All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.

The University is committed to paying the Living Wage.

Alumni/Donors

The University has also incorporated reference to the Modern Slavery Act into its Reputation Management Policy, to ensure that the terms and requirements of the Act are recognised in our dealings with our alumni and potential donors.

Future Steps

As noted above, the University is committed to developing its policies, processes and procedures to ensure on-going compliance with the Modern Slavery Act and to ensure the policies around a zero tolerance to incidents of human trafficking and slavery are embedded.

The University intends to maintain its training programmes on the Modern Slavery Act and will have access to new systems which facilitate the on-going monitoring of supply chains to facilitate effective risk management and on-going monitoring of potential areas of higher risk.

Approval

Approved as follows:

CGR Advisory Group, 23 March 2017

Vice-Chancellor's Executive Group (at the meeting on 22 May 2017)

Also received by Audit Committee at its meeting on 10 May 2017.