SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes De Montfort University’s slavery and human trafficking statement for the financial year ending 31 July 2016.

Organisational Structure

De Montfort University is a Higher Education Corporation established in accordance with the Education Reform Act 1988. We are a provider of education and research services and comprise four academic faculties: Business and Law; Health and Life Sciences; Technology; and Arts, Design and Humanities, together with a number of professional services directorates.

We have a global annual turnover of £181.4m¹

The university also has a subsidiary company, De Montfort Expertise Limited, through which its commercial activities are provided.

Our supply chains

The university’s supply chains are generally captured within the following super categories:

- Estates (hard and soft facilities management) works, products and services
- ICT equipment, products and services
- Professional services
- Science, technical, engineering and medical equipment, products and services

The sub-categories that carry material risks are:

- Construction works sub-contractors and supply chains
- Estates hard and soft facilities management services (such as maintenance, cleaning and security services)
- Office supplies/stationery
- ICT and audio visual (AV) equipment and products
- Laboratory supplies

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 are procured across all of these sub-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.

A significant proportion of the university’s demand for ICT equipment and products, including parts and accessories is also fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia. The Consortia supports the principles of, and works closely with Electronics Watch and includes contract monitoring

¹ DMU Income and Expenditure Account from Annual Accounts 2015/16
clauses created by Electronics Watch in all relevant agreements awarded by the Consortia and used by the university.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have employment policies in place and codes of conduct which have relevance to how this issue is addressed within our business by members of our staff.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace 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 anywhere in our supply chains.

It is the intention of the Finance Directorate at the university to develop a specific procurement policy on slavery and human trafficking in the supply chain. This will, taken with the university’s procurement procedures and supplier relationship management policy, ensure that the controls referred to in this statement can be effectively introduced and monitored. In addition to this, the university has existing workplace policies on sustainable procurement and ethical trading.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have systems in place to:

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

Supplier adherence to our values

We have a zero tolerance to slavery and human trafficking. To ensure that all suppliers and contractors in our supply chain comply with our values we have the following procedures in place:

a. We provide robust procurement procedures which form part of the university’s financial regulations approved by the university’s Finance and Human Resources Committee, and which all staff at the university are obliged to follow. These procedures are supported by a robust Supplier Relationship Management (SRM) policy. Taken together the procurement procedures and SRM policy include processes and guidance which enables the management of the university’s supply chains and business practices from the evaluation, selection and appointment of suppliers and contractors and throughout the term of the relationship (by means of the application of the supplier relationship management policy).

b. Controls are in place within the procedures and the policy which ensure that the tendering process for new suppliers and contractors and the management of the performance of, and relationship with suppliers and contractors includes the provision
and subsequent monitoring of compliance with the university’s policies, including policies against slavery and human trafficking.

c. This is further supported by the university’s terms and conditions of contract which include provisions whereby contracts can be terminated should a contractor breach such policies.

d. Similar provisions are also contained within Higher Education Purchasing Consortia (and other) framework agreements used by the university. In the event that the university wished to use a framework agreement which did not contain such a protection, it would seek to include such a provision by negotiation.

e. The university’s supplier relationship management policy requires that service level agreements (SLA) form part of the contract with suppliers and contractors that have an ongoing relationship with the university. The standard SLA template will be amended and both new and existing SLAs will include this area as a key performance indicator with a requirement that this is replicated through the contractor’s own supply chain. This will allow both an initial measurement and an ongoing management of the same thereafter.

Training available

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we intend to provide training for key members of staff based on a training needs analysis.

As approved by the Board of Governors on 24 November 2016.

Signed by............... Mike Kapur

Mr Mike Kapur, Deputy Chairman of the Board of Governors