

SLAVERY AND HUMAN TRAFFICKING STATEMENT

The enactment of The Modern Slavery Act into UK law during March 2015 was a pivotal milestone in fulfilling the aims and aspirations to combat Slavery and Human Trafficking here in the UK. The legislation provided authorities and other agencies the legal power and framework required to offer protection and criminal consequences for people seeking to exploit others. The Act and its enforcement is a key attribute for building the structure for social justice within our society.

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes De Montfort University's Slavery and Human Trafficking Statement from 1st August 2018 for the financial year ending 31 July 2019.

This Statement seeks to provide De Montfort University's response to the Modern Slavery Act and offers an outline of key areas where Slavery and Human Trafficking are deemed a higher risk area for potential prevalence within the University's supply chain.

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,
- Computing, Engineering and Media,
- Arts, Design and Humanities,

together with a number of professional services directorates.

We have a global annual turnover of £245.9 million¹.

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

Collaboration and partnership working

Procurement Services have engaged with the Leicester, Leicestershire & Rutland (LLR) Combating Modern Slavery Group, linking with Leicestershire Police, and academic, business, and charitable community representatives to improve public awareness and the prevention of slavery and human trafficking.

We also collaborate and share best knowledge and best practice with procurement representatives from other universities and public sector bodies.

Our supply chains

The University's supply chains are in the main captured within the following high-level category groupings:

- Estates (Hard and Soft Facilities Management) Works, Products and Services

¹ DMU Income and Expenditure Account from the Annual Accounts 2018/19

- ICT equipment, products and services
- Professional Services
- Science, technical, engineering and medical equipment, products and services

Each of the category groups above have been considered and the following specific categories have been identified as having a higher potential susceptibility to Modern Slavery and Human Trafficking occurrence.

- 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 supplies
- Clothing (sportswear and work wear)

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.

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 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 at the University or in our supply chains.

The University is in the process of further developing controls through clear reference to modern slavery and human trafficking commitments as part of an exercise to review our procurement policies and procedures and communicate these across the organisation alongside procurement support and guidance material.

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 approach 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 and controls 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) approach. Taken together, the procurement procedures and the SRM approaches, which include processes and guidance, 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.
- b. Controls are in place within the procedures and policies, which ensure that the tendering process for new suppliers and contractors and the management of performance, 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. Our supplier appraisal questionnaire has also been updated to include two declarations developed by Crown Commercial Services relating to the Modern Slavery Act 2015.
- c. The University's terms and conditions of contract, which include provisions whereby contracts can be terminated should a contractor breach such policies.
- d. Higher Education Purchasing Consortia (and other) framework agreements are used by the university which contain similar provisions. 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. A structured review and redevelopment of procurement procedures has been initiated and, as part of this work, the standard Service Level Agreements (SLA) templates will be amended to include management of slavery and human trafficking risks as a key performance indicator with a requirement that this is replicated through the contractor's own supply chain.

Training

To ensure appropriate awareness and understanding, training on awareness and management of the risks of modern slavery and human trafficking within our supply chains and business will be included as part of our procurement community events going forward.


Actions taken during the reporting year

The University has undertaken a review of key risks associated with low value spend. As a result, central controls were applied to require prior approval from management within the procurement services team, prior to any purchases from specific e-marketplace suppliers, in recognition of weaker assurance platforms relating to third party suppliers.

Central guidance and information have also been issued to direct all purchases of promotional printed clothing to a consortium approved framework supplier, in recognition of clothing being a high-risk category of supplies, with inherent challenges in obtaining expected assurances from some independent supplier organisations.

Procurement services is undertaking an in-depth review in the higher risk area of ICT equipment and products. This will determine our current performance with key suppliers, in areas such as contract conditions, contract management and due diligence, to then benchmark against best practice suppliers, HE peers and independent bodies such as Electronics Watch. The University intends for areas of identified improvements from this process to be implemented and further progress reported in the financial year ending 31 July 2020.

As approved by the Board of Governors on Date: **21/11/19**

Signed by..........

Ms Lin Hinnigan, Interim Chair of the Board of Governors