

## **Anti-Slavery and human trafficking statement for the financial year 2021/22**

### **Introduction**

The University of Greenwich is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes these same standards on its suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes the University of Greenwich’s modern slavery and human trafficking statement for the financial year commencing 1 August 2021 and ending 31 July 2022. It also describes planned actions in 2022/23.

This statement has been approved the University’s Governing Body, which, together with the Audit and Risk Committee, will review and update it as necessary on an annual basis.

### **Structure and business of the organisation**

The University is a UK based university. It was incorporated in 1970 as a company limited by guarantee and is an exempt charity for the purposes of the Charities Act 2011. The University is registered as a higher education provider with the Office for Students (OfS) and is subject to the OfS Regulatory Framework. The OfS is also the University’s principal regulator for charity law purposes on behalf of the Charity Commission for England and Wales.

The University’s Governing Body, working with the Vice-Chancellor, is responsible for setting and monitoring the University’s strategic direction and for ensuring the effective management of the institution. Members of the Governing Body act as company directors and as charity trustees.

The objects of the University are set out in its Articles of Association and are to advance learning and knowledge in all its aspects, to enable students to develop their abilities, to contribute to the community and to develop research.

The University, including its wholly owned subsidiary companies, had an annual income of £272m in the 2021/22 financial year. The University’s [financial statements](#) are available on the University’s website.

The academic structure of the University is organised around four faculties, organised into schools and research institutes and centres. Professional services directorates include within the Finance Directorate a procurement team which centrally procures key products and services, and provides professional purchasing support services to the University. The University has devolved purchasing to its Faculties and Professional Service Departments, limited to lower value and lower complexity transactions in accordance with its Financial Regulations, and purchases a diverse range of goods and services related to teaching, research, general operations and facilities management.

Further information regarding the University's business and structure can be found on the University [website](#).

## **Policies on modern slavery and human trafficking**

The University has adopted an [Anti-Slavery and Human Trafficking Policy](#), and continues to review its workplace policies and procedures to ensure that they comply with the University's commitment to act ethically and with integrity in all of its business relationships, including minimising the risk of slavery and human trafficking taking place anywhere in the University's supply chains.

The University recognises that it has direct responsibilities to the people it employs. It has clear and robust procedures for checking that its staff have the right to work in the UK before they are engaged. The University also has contractual mechanisms to ensure that the same checks are done for the staff of its contractors.

The University also takes care to confirm that its students have the knowledge and aptitude to commit to and complete their studies. There is a clear process for following up with students who are not engaging fully with their studies, whose aim is to explore and offer support (or signpost to specialist services) where needed. The University offers hardship funds and referral services for debt counselling.

The Procurement division within the Finance Directorate has day-to-day responsibility for working toward eliminating modern slavery from our supply chains. Its policy and standard procedures include conducting due diligence risk assessments on centrally-procured goods and services. The goods and services that are procured centrally include our key and preferred suppliers, suppliers appointed under procurement frameworks, and/or suppliers appointed to high value, high complexity and/or high risk contracts. The team is also responsible for supporting and advising colleagues with devolved purchasing responsibility. Wherever possible, this is achieved by procuring products and services pursuant to existing frameworks, to benefit from the due diligence checks the frameworks complete in their tender exercises.

## **Due diligence and compliance**

The University is a member of several purchasing consortia, including the [London Universities Procurement Consortium \(LUPC\)](#), a non-profit buying organisation. Through its [Business, Human Rights and Environment research group](#), the University is a key research partner of the LUPC and helped to create and inform the LUPC's training on modern slavery.

LUPC has published its own Anti-Slavery and Human Trafficking Statement which sets out its position and strategy in working to prevent acts of slavery and human trafficking throughout the supply chain. The University benefits from the LUPC's affiliate membership of [Electronics Watch](#), an independent monitoring organisation helping public sector organisations to protect the labour rights and safety of workers in global electronics supply chains. Through this affiliation, the University has

access to guidance, resources and contract clauses that support responsible procurement.

Other purchasing consortia with which the University engages (APUC, SUPC and Crown Commercial Services) have also published their own Slavery and Human Trafficking Statements.

The University's standard terms and conditions of supply include standard contractual clauses which oblige all suppliers of goods and services to the University to adhere to the principles of the Act and to maintain records and evidence of their compliance. Similarly, the University's agreement templates for agreements with overseas agents and international partner colleges include provisions to ensure their practices comply with the UK Act's requirements. Prospective UK collaborative partners are required to provide their modern slavery statement (where the partner is required by the legislation to produce one) as part of the University's partnership due diligence process. The University does not tolerate slavery and human trafficking within its supply chains.

The University also has a policy of not employing unpaid interns and encourages companies with which it engages across the range of suppliers of goods and services to pay its interns.

The University encourages the reporting of concerns relating to Modern Slavery and provides protection to those who do so under its [Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#). The whistleblowing procedure is available to members of the University community (including staff, students, Governors and staff employed by the University's contractors and agencies) to highlight any issues of concern.

### **Supply chain review**

As food and catering services had been identified as one of the University's higher-risk areas for modern slavery compliance, the General Counsel undertook a supply chain review of the University's new catering services supplier. The supplier, appointed after a tender process, provides almost all the university's food and catering services.

The General Counsel did a supply chain mapping exercise, which highlighted the complexity of the supply chain for catering services. The focus was on what the supplier could reasonably do, and was doing, to minimise the risk of modern slavery in its supply chain. Our supplier has taken reasonable steps to have short supply chains where possible, e.g. by working directly with growers.

Our supplier was able to demonstrate a documented approach to responsible sourcing of products and services. It conducts its own due diligence on the growers and downstream suppliers that it works with and renews its checks at least annually.

The review confirmed that due prominence was given to modern slavery and human trafficking in the procurement process, and that there were appropriate clauses in the

contract requiring the supplier to make practical efforts to eliminate modern slavery and human trafficking from its business and supply chains.

The supplier promptly provided its policies and procedures, including a supplier code of conduct, which gave confidence that it is aware of issues of modern slavery across its operations. The supplier demonstrated that it has detailed questionnaires for its own suppliers, which it uses both to highlight its commitment to eliminating modern slavery, and to conduct auditable due diligence on each of its suppliers' exposure to modern slavery risk. There is an annual review process which confirms no unacceptable change in the level of risk and asks whether any modern slavery issues have been detected in the course of the year.

In questions aiming to probe beyond the "paper shield", our supplier was able to give timely and reassuring answers about its practices. It confirmed that it has routine processes to review, and if necessary terminate, agreements with its suppliers, if a modern slavery breach is found, although it has not had to terminate any agreements for this reason.

Our supplier was able to confirm that it has rigorous staff checks in place to confirm that all of its people have the right to work in the UK and are paid a fair wage.

### **Further steps**

With the combined effects of the pandemic and the rising cost of living, the University recognises that some students may face difficult decisions around their study/work/life balance, and it has increased the amount of financial and other support available to students who might otherwise find it difficult to cope.

The University is continuing its roll-out of e-learning on the Modern Slavery Act 2015. Staff turnover and configuration of the module have meant that we will be carrying over into the coming cycle the checks to ensure that training has been completed by all existing staff and new joiners with purchasing responsibilities. Staff undertaking the training are required to complete a test with a pass mark. All other staff will be encouraged to complete this module, to further improve the chances that modern slavery can be identified and combated in the University's supply chains.

The University's General Counsel and Head of Procurement will work together on a scheduled review of procurement policy and processes to confirm that the University is keeping pace with good practice in the sector.

In recognition of the complexity discovered in the catering services supply chain review, the University's General Counsel will procure training on best practice in supply chain mapping. The next priority areas for review, on the basis of risk, are laboratory supplies, PPE and clothing, and electronic goods.

The expertise of the University's Business, Human Rights and Research Group will also be drawn upon in deciding and implementing actions in the coming year.

Approved by the Governing Body on 23 November 2022.

Signed on behalf of the University of Greenwich

[Signature redacted]

Bronwyn Hill, Chair, Governing Body