

Anti-Slavery and Human Trafficking Statement for the Financial Year 2023/24

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 2023 and ending 31 July 2024. It also describes planned actions in 2024/25.

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 and Chief Executive Officer, 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 £329.5m in the 2023/24 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 [Delegation Framework](#), 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 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 and other forms of counselling and support.

The Procurement team 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. 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. 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. Members of the BHRE research group have worked directly with the LUPC to inform their approach to widening and deepening the LUPC's own approach to due diligence and supply chain reviews, which the University benefits from when purchasing under LUPC frameworks.

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 Procurement team's due diligence process includes a set of questions which aim to look behind suppliers' policies and procedures to probe whether meaningful efforts have been taken to identify modern slavery risks, and how suppliers have dealt with (or would deal with) concerns or identified instances of modern slavery. The University is ready to take robust steps to ensure that suppliers deal meaningfully with any suspected or actual incidences of modern slavery or human trafficking. In the first instance this may involve working with suppliers to confirm that they are taking active steps to eliminate modern slavery and human trafficking in their businesses and supply chains. Where there is low confidence in this, or where a serious breach has been confirmed, the University is ready to move its business to other suppliers.

The University 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.

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

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.

The University is concerned to ensure that its students and staff do not fall victim to criminal exploitation, including modern slavery. Following a review in 2022/23 by the Violence and Vulnerability Unit to assess the University's support mechanisms for addressing county lines (a form of modern slavery), we organised training on modern slavery in 2023/24 which was delivered by [Unseen](#) (the charity which runs the UK Modern Slavery and Exploitation Helpline) to the University's Safeguarding Officer network, Students' Union staff, Student Wellbeing Service staff and members of the executive. Training on county lines was delivered by the consultant from the Violence and Vulnerability Unit. Guidance pages on modern slavery and county lines have been created on the University's [Report + Support](#) portal with information on sources of support and how students and staff can report concerns. A poster to raise awareness of county lines was also developed.

Supply chain reviews

Priority supply chains for review include laboratory supplies, PPE and clothing, electronic goods and catering supplies. It was discovered that risk in these areas is being mitigated by purchasing as far as possible through the LUPC frameworks, where we were able to rely on some supply chain review work that had already been completed.

The LUPC is conducting further review in these areas to understand at a deeper level where the supply chain risks may lie. The University has initiated its own reviews based on both the LUPC, and its own work both at the point of procurement and in proactive supply chain reviews.

Further steps

The University provides mandatory e-learning training on modern slavery for staff with procurement responsibilities, and it is available to any staff who wish to take it. The module logs completion and includes a test and pass mark to confirm engagement with the content. The training and the categories of staff required to complete it will be reviewed in 2024/25 following the University's move to a new staff e-learning provider.

The University's General Counsel and the Associate Director of Procurement will continue to work together on a business-as-usual review of procurement policy and processes to confirm that the University is keeping pace with good practice in the sector.

A review at Tiers 1 and 2 of procurement of lab consumables is in progress, based on the UK Government's Modern Slavery Assessment Tool (MSAT) methodology and additional questions created by the University. Similar reviews into catering and clothing will take place in 2024/25.

Approved by the Governing Body on 25 November 2024.

Signed on behalf of the University of Greenwich

Craig McWilliam, Chair, Governing Body