

Anti-Slavery and human trafficking statement for the financial year 2022/23

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 2022 and ending 31 July 2023. It also describes planned actions in 2023/24.

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 £307m in the 2022/23 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 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. 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 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

Priority supply chains for review include laboratory supplies, PPE and clothing, and electronic goods. 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 will carry forward its own review based on this and its own work.

Further steps

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.

An e-learning module on the Modern Slavery Act 2015 has been rolled out for staff and new joiners with purchasing responsibilities. Staff undertaking the training are required to complete a test with a pass mark. The plan to publicise the training to all staff more widely will be carried over to this year, 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 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.

The University's General Counsel has researched and received training on supply chain mapping. A review at Tiers 1 and 2 of catering and food supplies was undertaken in the prior year, and the aim will be to conduct a more detailed review in the year 2023/24 using the UK Government's Modern Slavery Assessment Tool (MSAT) methodology. Some of the University's planned activity in the area of laboratory equipment and PPE is being carried forward into 2023/24, and will involve consulting with the LUPC and its own BHRE research group to understand practically what more it can do to satisfy itself that it is taking all reasonable steps to eliminate modern slavery from its supply chains.

The University is concerned to ensure that its students and staff do not fall victim to criminal exploitation, including modern slavery. In 2022/23 we participated in a stocktake review by the Violence and Vulnerability Unit to assess the University's support mechanisms for addressing the problem of county lines. As part of the actions arising from the review, training is being arranged by the University Secretary for the University's safeguarding officer network and other frontline staff on county lines and other forms of criminal exploitation. In 2023/24, we will create guidance for staff on how to identify the warning signs of the various forms of criminal exploitation (including modern slavery) with signposting to our portal for reporting concerns.

Approved by the Governing Body on 21 November 2023.

Signed on behalf of the University of Greenwich

Bronwyn Hill, Chair, Governing Body