

# Modern Slavery Act 2015

## Modern slavery and human trafficking statement for financial year ending 31 July 2016

### Introduction from the Board of Governors

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

We are committed to improving our practices to ensure there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

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

### Organisational structure

We are a Higher Education provider based in the United Kingdom, with campuses in Wolverhampton, Walsall and Telford, learning centres in Stafford, Telford and Burton and business solutions centres in Wolverhampton, Telford and Hereford. We have over 23,000 students within the UK and abroad and 2,400 UK based staff.

The University welcomes students from around the world and has regional offices in Malaysia, Oman, India, Nigeria, China and South Africa. Courses are also delivered in China, France, Greece, Hong Kong, India, Ireland, Myanmar, Oman, Singapore and Sri Lanka.

As a University, we have an annual turnover of £188,000,000.

The University of Wolverhampton Higher Education Corporation within its group structure has a number of established subsidiary companies which are either wholly or jointly owned. Further details on the group structure and markets can be found here <http://www.wlv.ac.uk/about-us/>

## **Our policies and procedures relevant to 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.

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

Our Procurement Strategy already demonstrates 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.

[https://www.wlv.ac.uk/staff/media/departments/finance/Procurement-Strategy-Sept-2016-FINAL-\(Web\).pdf](https://www.wlv.ac.uk/staff/media/departments/finance/Procurement-Strategy-Sept-2016-FINAL-(Web).pdf)

### **Use of Recruitment/Agency Workers**

The University uses only specified, reputable employment agencies to source labour, using a rigorous procurement process, which is committed to assisting in the eradication of unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour, before it accepts any workers from that agency.

### **Our Core Values**

Our core values are as follows: Ethical; Respectful; Challenging; Inclusive & Fair; Transparent; Collaborative; Professional. These values guide the decisions we make and how we engage with communities, our partners, staff and students both locally and globally. Various University procedures, including the Dignity at Work and Study policy and the University's Disciplinary policy makes it clear to employees the actions and behaviours expected of them when representing the University.

<http://www.wlv.ac.uk/about-us/governance/legal-information/policies-and-regulations/individual-conduct/dignity-at-work-and-study-policy/>

<https://www.wlv.ac.uk/staff/services/humanresources/policiesandprocedures/staff-disciplinary/>

### **Public Interest Disclosure Policy (“Whistleblowing”)**

Our Public Interest Disclosure Policy (<http://www.wlv.ac.uk/media/departments/office-of-the-vice-chancellor/documents/Public-Interest-Disclosure-Policy-July-2015.pdf>) encourages all of our workers to report any concerns related to the direct activities of the University. (This would cover any circumstances that may give rise to an enhanced risk of slavery or human trafficking).

The procedure is designed to make it easy for workers to make disclosures about wrongdoing so that problems can be identified and resolved quickly within the University without any fear of mistreatment or reprisal.

Students are not employees of the University so are therefore not covered by the provisions of the Public Interest Disclosure Act and the related policy. However, the University remains committed to ensuring the highest professional standards and urges students with concerns to raise their concerns through the Student Complaints Process and Procedure. (<http://www.wlv.ac.uk/current-students/conduct-and-appeals/complaints/>)

## **Safeguarding Procedures**

Our duties as staff members (within the University community) are regularly communicated to all staff and extend to safeguarding concern for our students, each other, guests and visitors. This would include protecting the rights of adults to live in safety, free from abuse or neglect; and working together to prevent and stop the risks and experience of adult abuse and neglect - including exploitation.

We have a clear process in place for reporting any concerns with regard to safeguarding, and are committed to working with the relevant authorities or agencies where necessary, in consultation with the University Safeguarding Panel.

<http://www.wlv.ac.uk/media/departments/office-of-the-vice-chancellor/documents/FOI-041-2016-Safeguarding.pdf>

## **Due diligence processes for slavery and human trafficking**

As part of the University's due diligence processes into slavery and human trafficking the supplier management process will incorporate a review of the Suppliers compliance and also the controls they have in place to assess their own suppliers:

We are implementing systems 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.

The University will not knowingly support or deal with any business involved in slavery or human trafficking.

## **Our supply chains**

Our supply chains include works, goods and services from a wide range of suppliers and across a number of categories. We only use reputable suppliers and expect them to have adequate procedures in place.

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have taken steps to identify actions that are required to be able to implement a supply chain compliance programme.

All Tenderers must complete a Declaration of Compliance as part of their tender, in addition to completing the standard Cabinet Office Supplier Questionnaire within their submission. The successful tenderer will be requested to provide copies of their Statements and Policies where relevant. In addition, all current Suppliers will be asked to sign a Declaration of Compliance and provide the relevant supporting documentation.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Human resources
- Procurement

## **Training**

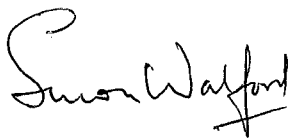
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, relevant Procurement staff are Chartered Institute of Purchasing and Supply (CIPS) qualified or working towards the qualification and therefore follow the CIPS Code of Conduct. This is also detailed in our Procurement Strategy and Policy documentation.

We intend to provide additional training to all staff involved in any supplier activities.

## **Further steps**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- We will ensure all suppliers, across all categories, not just the high risk areas such as: agriculture, hospitality, clothing, IT, construction and staff agencies, complete a Declaration of Compliance and provide the relevant supporting documentation.
- We will develop and implement a Modern Slavery Policy.
- We will review our Whistleblowing policy to ensure there is a reference to modern slavery and human trafficking.
- We will develop a communications plan to ensure that key staff are aware of the responsibilities of the University under the Act and to ensure that whistle-blowing arrangements under the University's Public Interest Disclosure Policy are understood and well-publicised
- We will continue to assess any ongoing specific training needs for relevant staff (for example, those in Procurement and HR), undertaking further training as required in respect of the Modern Slavery Act.



Dr Simon Walford, Chair of the Board of Governors

University of Wolverhampton