

## **Modern Slavery Act 2015 (the “Act”)**

Modern Slavery and Human Trafficking Statement  
November 2019

### **Introduction**

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.

The University of Hertfordshire does not engage in or condone the practices of slavery, human trafficking or forced labour and is committed to improving its practices to combat slavery and human trafficking within its supply chains.

**This statement is made pursuant to section 54(1) of the Act and constitutes our Group’s modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2019.**

### **The University’s organisational structure**

We are a provider of educational learning and research in the higher education sector.

The University of Hertfordshire Higher Education Corporation has, within its group structure, several established subsidiary companies, which are either wholly or jointly owned. Further details on the group structure and its business is available [here](#).

In the financial year 2018/19, our global annual turnover was £271.8m.

### **Our supply chains**

University procurement follows one of two pathways: (1) collaborative procurement (through regional HE purchasing consortia); or (2) in-house tendering and contracting.

- The University continues to be a member of the Southern Universities Purchasing Consortium (SUPC) which is, in turn, a member of Procurement England Limited (PEL) – the shared vehicle by which English higher education purchasing consortia manage joint developmental and improvement projects for collaborative procurement in our sector.
- Together, the purchasing consortia have published a [shared Sustainability Policy](#) to which all PEL member consortia are committed. This policy contains steps that form part of the supplier selection for the major contract procurement processes that are conducted for consortium members, and supports the process of ensuring that slavery and human trafficking are not taking place in a member’s supply chain.
- The University’s procurement function is supported by a published and implemented Sustainability Strategy to which we are fully committed, and which can be found [here](#).

The University's core supply chains include the following:

- Catering;
- Commercial bus operations (including vehicle and diesel fuel purchases);
- Estates goods, services and works;
- ICT equipment and services;
- Professional services; and
- Science, Technology, Engineering and Medicine (STEMed).

### **Where do we consider there to be a risk?**

The principal categories which are considered to carry material risk are: office supplies, laboratory consumables, ICT equipment, and some estates services (such as cleaning and security services).

### **Our policies**

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 chains are slavery-free, our University Policies and Regulations (UPRs) in relation to [Equality and Diversity](#) and [Procurement](#) – with which all staff and students must comply – contain terms that specifically require that steps be taken to ensure compliance with the Act.
- The policies demonstrate our commitment to acting ethically and with integrity in all our business relationships, and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. A full list of UPRs is available [here](#).

We have zero tolerance to slavery and human trafficking and continue to review all agreements and dealings with suppliers to ensure strict adherence to our values and compliance with the Act. All our standard terms and conditions of contract (used when procuring services from suppliers) include clauses which specifically require compliance with the Act and reporting to the University of any actual or suspected breaches of the Act.

### **Due diligence**

Due diligence in relation to modern slavery and human trafficking embraces a range of actions which the University regularly undertakes to mitigate the risk of non-adherence to the Act:

- Members of our staff continue to receive modern slavery training. In May 2019, Procurement, Legal & Compliance and Internal Audit staff were all trained by a specialist external lawyer. We have also held procurement presentations across the University Group to ensure that staff are aware of a range of regulatory requirements, including the provisions of the Modern Slavery Act;
- All staff are required to comply with the UPRs in relation to their interactions with suppliers;
- All suppliers who contract with us under our standard terms and conditions must comply with our UPRs and with specific contractual terms relating to compliance with the Act;

- The use of consortia frameworks ensures that contractors are properly vetted, and their working practices are regularly assessed for compliance with the Act;
- Responsible Procurement category guides (covering economic, environmental and social aspects) are used by contract managers at pre-tender stage to enable informed social consideration decision making;
- Contractor Account Management Meetings incorporate Modern Slavery & workers' rights as regular agenda items for discussion and documenting;
- Due diligence completed during tender exercises is recorded in our e-tendering system.

In addition:

- We have again written to all contractors listed this year on our procurement contract management system, requesting that they certify their compliance with the Act, and the University is in the process of collating returns from suppliers certifying such compliance.
- In the past year, no concerns have been raised by members of staff or external contractors regarding modern slavery within the University's supply chains. However, the University continues to monitor compliance.

## **Plans for the Future**

### **(1) Training**

We intend to continue to review the need for further specialist training for our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking within our supply chains.

### **(2) Other steps**

Other steps which we intend to take include:

- Continuing to develop a procurement action plan for combatting modern slavery within our supply chains and monitoring our effectiveness;
- Continuing to identify, assess and monitor potential risk areas within our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Continuing to carry out work to raise awareness amongst all staff (including those involved in the procurement process) through training and publication of information on internal websites;
- Increasing staff and supplier awareness of University procedures for reporting any actual or suspected modern slavery through appropriate, identified contact points;
- Considering appropriate performance indicators for evaluating our effectiveness in ensuring that no slavery or human trafficking is taking place within our supply chains, and particularly those identified as carrying material risk; and
- Recording and monitoring any allegations or incidents relating to modern slavery reported to us by staff, suppliers and/or third parties.

In the coming year (2019/20), we will:

- Continue to keep the provisions of our UPRs relating to the Act under review;
- Record all due diligence arising during the contractual procurement process;
- Keep the training of our contracts teams under review;
- Ensure contract managers continue to assess and capture responsible procurement (economic, environmental and social) aspects during contractor management meetings; and
- Request that contractors self-certify their compliance with the Act.

This statement has been approved and published by the University's Board of Governors and will continue to be reviewed annually.

**DR LYNN DRUMMOND**

**CHAIR OF THE BOARD OF GOVERNORS OF UNIVERSITY OF HERTFORDSHIRE**

**26 November 2019**

Please note that the original signed copy of this statement is lodged with the University's Governance Services Department.