

*Following endorsement by UEB (20 April 2023) and Audit and Risk Committee (6 February 2023), the Modern Slavery Act Transparency Statement is pending final sign-off by Council on 18 May 2023.*

## **Modern Slavery Act Transparency Statement University of Exeter**

### **Financial Year 2021/22**

#### **Introduction**

At the University of Exeter (“the **University**”), we are committed to protecting and respecting human rights and do not tolerate slavery, human trafficking and other exploitation. This statement complies with Section 54, Part 6 of the Modern Slavery Act 2015 (“the **Act**”) and sets out the steps the University has taken regarding slavery and human trafficking.

#### **The University of Exeter**

The University combines world class research with high quality education at its campuses in Exeter, Devon and Penryn and Truro, Cornwall. Formed in 1955, the University has over 30,000 students from 130 countries and over 130,000 alumni in 183 countries providing our academic community of staff, students and visiting researchers with a truly global experience and diverse, inclusive environment. Its success is built on a strong partnership with its students and academics and a clear focus on high performance.

#### **Policies**

As already noted, the University is committed to protecting and respecting human rights and has embodied this ethical stance in a number of its policies, including:

- The University Ethics Policy
- Professional Code of Conduct
- Dignity and Respect
- Good Practice in the Conduct of Research

The University has several policies that set out standards for procurement and suppliers. These include:

- Sustainable Bought Goods and Services Policy. This policy ensures we procure goods and services that minimise damage to environmental, social and ethical issues.
- Chartered Institute of Purchasing and Supply (CIPS) Code of Conduct. Most of our strategic procurement officers are members of CIPS, the professional association. As members, they must comply with this code, which includes adherence to laws, ethics and personal integrity
- Fair Trade policy
- Sustainable Food Policy
- Procurement Policy on Modern Slavery
- Procurement Procedures Manual. This includes guidance on social value, modern slavery & IR 35 legislation.
- HEPA published Modern Slavery Act 2015 Tools

#### **Procurement Supply Chain**

In the Financial Year 2021/22, the University spent circa £160 million gross with in excess of 4,600 suppliers. Procurement valued at and above £50,000 ex VAT was managed by Procurement Services

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to ensure compliance with legislation & to achieve value for money on bought-in goods and services. Spend below this figure is mostly undertaken directly by the Colleges and Professional Services Teams.

Almost all supplier expenditure was with first tier suppliers who have registered addresses in the UK, of which relatively few items relate to outsourced services.

## **Risk**

The University has undertaken a high-level risk assessment to identify the potential sectors and suppliers where issues around human trafficking have historically arisen including:

- Supply of clothing/uniforms
- Outsourced cleaning services
- Outsourced security services for events
- IT industry, including computers, tablets, and mobile phones
- Agency Workers
- Construction industry

**Clothing:** The University does not have a significant volume of purchasing from the clothing sector. Most members of staff do not wear a uniform. Having considered our supply chain and our procurement procedures, we have assessed the risk to be low.

**Outsourced cleaning services:** The University purchases outsourced cleaning services from local SMEs to supplement its own cleaning teams during periods of high demand e.g. summer school, events etc. Having considered our supply chain and our procurement procedures, we have assessed the risk to be medium but is managed through robust due diligence checks.

**Outsourced security services:** The University purchases outsourced security services from local SMEs to supplement its own security teams during periods of high demand to facilitate events etc. Having considered our supply chain and our procurement procedures, we have assessed the risk to be low.

**IT:** The University purchases a wide range of electronic and IT equipment and software. Some of those items, particularly laptops, mobile phones and tablets can contain metals usually sourced in high-risk regions and the University is aware there is a well-documented risk of dangerous working conditions and child labour. However, the University's main supplier of laptops and desktop computers is HP, who monitors its supply chain closely.

**Agency Workers:** The University has identified there is a potential risk with agency staff for cleaning, portering and other high service roles. The University has identified there may be small amounts of temporary recruitment being undertaken outside of Procurement Services. The use of agency workers is quite limited and normally undertaken via existing university sector frameworks awarded after careful due diligence of suppliers. Where agencies are used on a one-off basis these tend to be UK based and registered businesses. The main cleaning contract stipulates that the Real Living Wage (RLW) is to be paid to staff, with regular checks undertaken.

**Construction:** Most construction is carried out by major companies, which perform much of their work through their contractors. However, most of our building contractors abide by the Considerate Contractor code of conduct which includes a commitment to the well-being of the site workforce.

In terms of procurement, also see below the statements regarding Terms and Conditions and contractual arrangements.

## **Training**

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The University arranged training on the Act for staff, and additionally, Procurement Services' staff have also undertaken training that specifically addresses 'Protecting Human Rights in the Supply Chain' a course that looks at the issue of human trafficking/ethical procurement. This training is available to all strategic procurement staff and other senior personnel involved with operational procurement.

The University has updated its corporate governance training and this now includes a section that covers the Act. This training is available to all staff. The Procurement Team are also looking to include Social Value in their procurement practice and procedures.

### **Procurement and Contractual Due Diligence**

The University maintains its procurement templates, including the Selection Questionnaire and tendering documentation to ensure these are in line with regulatory requirements around modern slavery.

The University also works with a number of procurement consortia including the Southern Universities Purchasing Consortium (SUPC) and is reassured that they are applying similar measures to their procurements and framework agreements.

The University maintains its standard terms and conditions for purchasing of goods, works and services, together with its contracts for Contractors and Consultants, to include an obligation to comply with the Act and to pass this down to any supply chain.

### **Identifying Instances of Modern Slavery in Supply Chain**

The University has not identified any instance of a breach of the Act in its supply chain. Additionally, the University is of the view that a breach of the Act would be a material breach of its contracts. In a scenario where the University identified any instance of modern slavery in its supply chain, it would seek to take action in accordance with due process. Actions would include: informing the police and terminating a contract.

Procurement at the University works to a category management approach, which gives a greater granularity of detail regarding categories of expenditure (particularly focusing on IT infrastructure, construction, cleaning and catering). This will enable the University to reduce its supplier base and have greater scrutiny of these suppliers and their supply chain.

### **Raising Concerns**

Where staff or others have concerns about potential breaches of the Act, these can be raised directly with the University's Chief Financial Officer, who can be contacted via the following e-mail address: A.Connolly@exeter.ac.uk.

### **Monitoring and auditing**

The University does not have the resources to audit its supply chain to second, third (and lower) tiers, so we intend to collaborate with others in the Higher Education sector and Central Government (e.g. Cabinet Office/CCS frameworks). The University has reviewed and tried one service for monitoring corporate social responsibility (CSR) for suppliers, but this seemed undeveloped and unsuited for our needs.

The University analyses its external expenditure on bought goods & services to better understand & manage this expenditure. The University has now also subscribed to Net Positive Futures, a supply chain sustainability monitoring platform that help it to better capture and understand supply chain activity plans for the Act and its carbon footprint from bought goods & services. This currently covers first tier suppliers but it is hoped that this can be extended to lower tiers as and when suppliers and the University can capture and report this data.

### **Category management**

### **Finance and Procurement Systems**

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The University's finance and procurement systems:

- improve the visibility of our chosen suppliers and contracts so members of staff can select goods and services from approved suppliers;
- provide greater clarity and auditable detail regarding how we identify and procure our suppliers and contractors;
- facilitate our management of suppliers e.g. supplier rationalisation, supplier relationship management;
- facilitate our management of supply categories and mitigate their risks.

### **HR Statement**

The University directly employs approximately 7,000 employees and we have a robust set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce.

Our Human Resources (HR) directorate and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, applicants have to provide 'right to work' information which is checked at offer stage. The majority of interviews are conducted visually in either a face to face or live video format which provides assurance that individuals have freely chosen to attend. A copy of the interviewee's right to work documentation is taken and either the originals verified by a University employee or, for visa holders (where applicable), the Home Office online checking service is used. The Home Office check is then verified virtually by means of a video call. The 'right to work' checks take place before a potential employees start date or on the morning of their first date of employment.

All employees receive a written contract of employment. HR also provide information to all new employees on their contractual rights including sick pay, holiday pay and other benefits they may be entitled to.

The University is committed to paying the Living Wage Foundation "Real Living Wage".

Salary payments will only be paid into a bank account (or joint bank account) in the name of the employee/worker.

As the University implements its Global Strategy, we expect to employ an increasing number of individuals outside the UK. The University has agreed a policy and procedures to ensure that overseas employment is fully compliant with statutory requirements in the host country on tax, social security and employment, where appropriate taking advice from professional advisers in the host country. This will include ensuring that employment arrangements, whether they are employed directly by the University or through a third party, comply with the University's responsibilities under the Act.

### **Alumni/Donors**

The University has also incorporated reference to the Act into its Reputation Management Policy, to ensure that the terms and requirements of the Act are recognised in our dealings with our alumni and potential donors.

### **Future Steps**

As noted above, the University is committed to developing its policies, processes and procedures to ensure on-going compliance with the Act and to ensure the policies around a zero tolerance to incidents of human trafficking and slavery are embedded.

The University intends to maintain its training programmes on the Act and will have access to new

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systems which facilitate the on-going monitoring or supply chains to facilitate effective risk management and on-going monitoring of potential areas of higherrisk.

This statement is available at the University's web site [here](#).

**Version 1- Owned by the General Counsel and Director of Legal and Student Cases**

Endorsed as follows:

University Executive Board, at its meeting on [20 April 2023]

Also by Audit and Risk Committee, at its meeting on [6 February 2023]

Approved as follows:

Council [awaiting final sign-off on 18 May 2023]

Professor Lisa Roberts

Vice-Chancellor and Chief Executive