

ANTI - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(Financial Year ending 31st July 2016)

Introduction

The University, as a charitable educational institution, has a zero tolerance approach to modern slavery within our business and supply chains and is committed to sound corporate governance acting ethically, with integrity and improving our practices to prevent slavery and human trafficking.

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.

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

Organisational structure

The University of Bolton is an exempt charity.

We are a teaching-focused, research-informed University with a global student body of circa 11,000 students including all campuses and affiliates. We employ approximately 650 members of staff.

Our main campus is located in Bolton and we also have a number of well-established collaborative provision partnerships within the following countries: Botswana; Malawi; Zambia; Greece; Czech Republic; Germany; Vietnam; United Arab Emirates, China and Malaysia.

The University has an annual turnover in excess of the statutory threshold.

Our approach

The University is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation.

Our existing policies and procedures demonstrate the University's commitment to acting ethically and with integrity in all our business relationships.

The University supports the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used

- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided wherever possible
- No harsh or inhumane treatment is allowed

To ensure a high level of understanding of modern slavery and human trafficking, the University intends to develop an anti-slavery and human trafficking policy which will reflect the University's commitment to acting in an ethical manner and improve our practices to ensure the prevention of slavery and human trafficking.

Our supply chains

The University intends to carry out a supply chain mapping process or risk assessment/analysis in respect of supply chains.

The University expects the highest standards of conduct and probity throughout our business and supply chains.

Our procurement processes provide that suppliers prove a high level of corporate social responsibility during the tendering and selection process.

In order to mitigate any risk in terms of possible modern slavery the University takes the following action(s):

- Procurement is with suppliers that are pre-approved either through public tenders managed by procurement services within our Finance department or by purchasing consortia. The University is a member of the North Western Universities Purchasing Consortium (NWUPC), which is a member of Procurement England Limited (PEL), established for English higher education purchasing consortia to advance and improve collaborative procurement in the higher education sector. Together, the purchasing consortia have published a shared sustainability policy to which all PEL member consortia are committed. This policy contains conditions that form part of the supplier selection for the major contract procurement processes that are conducted for the consortium members, ensuring that slavery and human trafficking are not taking place in the supply chain.
- Due diligence and site appraisals are undertaken for all new collaborative education provision partnerships with annual reviews thereafter.

Our due diligence processes in relation to slavery and human trafficking

As part of our initiative to identify and mitigate risk we have established a Task Group responsible for:

- identifying and assessing potential risk areas in our supply chains

- mitigating the risk of slavery and human trafficking occurring in our supply chains
- monitoring potential risk areas in our supply chains
- protecting employees that wish to raise concerns

The Task Group consists of representatives from the following departments and is chaired by the Director of Human Resources:

- Legal and Compliance
- Human Resources
- Finance (Procurement)
- Off Campus Division

Supplier adherence to our values

The University has a zero tolerance approach to slavery and human trafficking. To ensure all those in our supply chain comply with our values we shall put in place an anti-slavery compliance programme that consists of the following:

- targeted supplier Modern Slavery Act awareness training
- clauses in supplier agreements requiring compliance with anti-slavery measures
- a review of agreements and/or dealings with suppliers to ensure compliance with anti-slavery measures

The anti-slavery compliance programme shall be pro-actively implemented by the Task Group.

Anti - Modern Slavery Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our University, we intend to provide training to relevant staff members and, where appropriate, business partners. We will also require our business partners to provide training to their staff and suppliers.

Further steps to prevent modern slavery in our supply chains

As part of the reporting exercise in this and the coming years the University expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working within them.

The University intends to take the following further steps to prevent slavery and human trafficking:

- develop a modern slavery action plan for 2016/17 that includes actions to mitigate any risks identified

- raise awareness of modern slavery and human trafficking through targeted training
- targeted communication from senior management to suppliers servicing higher risk areas of our business raising awareness of the Modern Slavery Act
- develop a modern slavery and human trafficking policy
- compliance with the Modern Slavery Act to be a requirement in all contracts going forward

This statement has been approved by the Executive Board and shall be reviewed annually.

Dated: April 2017

Approving Committee/Board	Executive Board
Reviewing Committee/Board	Executive Board
Circulation	Board of Governors