

REPORT



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(Financial Year ending 31st July 2022)

Introduction

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

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 2022.

This statement provides an overview of the steps the University has taken and continues to take to ensure that slavery and human trafficking does not take place within our business or supply chains.

Our Organisation Structure

Bolton College, Alliance Learning, the Anderton Centre, UoB Services Ltd and UoB Security Services Ltd are subsidiaries of the University and part of the University of Bolton Group. This annual statement is made on behalf of the University of Bolton only.

In the financial year ending 31st July 2022 the University had an annual turnover of circa £90 million. Our subsidiaries do not have an individual turnover in excess of £36 million and therefore are not required to publish a separate statement. Our subsidiaries follow the key principles contained within this statement and provide the University with an annual report on issues.

The University is a teaching-intensive, research-informed University with a student body of circa 11,000 students including all campuses and affiliates. There are approximately 915 members of staff employed across the University.

Our main campus is located in Bolton, UK and we have a number of well-established collaborative provision partnerships in the UK and within the following countries; Botswana, Malawi, Zambia, India, Greece, Germany, Vietnam, United Arab Emirates, China and Sri Lanka. Given the global reach of our University, we recognise that there are potential risks of modern slavery related to our international activities, especially when located in high risk countries and we therefore aim to work collaboratively with civil society organisations and government agencies to share information and mitigate risks.

We buy a wide range of goods and services, in accordance with public procurement law and ethical sourcing policies. These include (but are not limited to) construction services and supplies, furniture and stationery, electronics (computers, audio visual equipment, telephones), food and catering supplies, travel services, laboratory, medical and dental supplies (small and large equipment, chemicals, consumables, pharmaceuticals), books and printing and facilities services. A large proportion is bought through frameworks established by collaborative consortia, particularly the North West University Purchasing Consortium (NWUPC). A copy of their modern slavery statement can be found at <https://www.nwupc.ac.uk/modern-slavery>

Our Policies

The University is committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our group structure.

We comply with all applicable employment law relating to employee terms and conditions, including pay. The University is an accredited voluntary Living Wage employer. This means that the University has committed to pay both employees and the staff of contractors and sub-contractors who work regularly on University premises in the UK at or above the Living Wage rate.

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Our people management policies set out our workplace terms and conditions. We check that new staff working at the University have the right to work within the UK and use temporary staff / contractors introduced via vetted recruitment agencies through our procurement procedures.

The University continues to support 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 practiced
- Regular employment is provided wherever possible
- No harsh or inhumane treatment is allowed

Policies that contribute to and support our approach and commitment to acting ethically and with integrity in all our business relationships include:

- **Modern Slavery and Human Trafficking Policy:** ensures a high level of understanding of modern slavery and human trafficking and reflects the University's commitment to acting in an ethical manner and to improve our practices to ensure the prevention of slavery and human trafficking.
- **Equal Opportunities Policy:** encourages all members of our University community to value diversity and to respect each person's individuality and to ensure that no-one receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age nor religion or belief.
- **Public Interest Disclosure Policy:** offers individuals a confidential mechanism to disclose concerns of possible malpractice or impropriety to protect the organisation. This includes matters pertaining to our supply chain which would include modern slavery and human trafficking.
- **Anti-Bribery Policy:** sets out the University's rules and what is expected of all members of our University community, partner organisations and third party service providers in all dealings with us or on our behalf.

Our supply chains, collaborative partnerships and due diligence

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

In the period under review we have sort and gained formal assurances from each of our subsidiaries that the rights of workers are fully observed and no modern slavery related issues have been observed.

We work with over 1,300 active suppliers. Our procurement processes ensure that suppliers evidence a high level of corporate social responsibility during the tendering and selection process.

We have a portfolio of around 40 collaborative partners delivering our programmes under franchise and validation arrangements in the UK and internationally. Before we enter into collaborative arrangements for the delivery of our programmes with partners our due diligence processes require careful consideration of the level of responsibility exhibited by potential partner institutions.

In order to mitigate any risk in terms of possible modern slavery the University continues to take the following action(s);

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- 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 UK Universities Purchasing Consortia (UKUPC). UKUPC is a partnership between eight UK consortia who created a formal entity to support collaborative procurement within Higher Education and Further Education. All eight consortia work together to share knowledge and best practice, to support each other and our wider procurement community.
- the UKUPC Board is comprised of heads of the UK regional purchasing consortia (APUC, HEPCW, LUPC, NEUPC, NWUPC, SUPC), the head of TEC and the head of TUCO.
- together, the purchasing consortia have published policies to which all UKUPC member consortia are committed. These policies contain conditions that form part of the supplier selection for the major contract procurement processes that are conducted by 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 (through the Annual Review of Partner Operations (ARPO) which includes a question about the approach to Modern Slavery in partner organisations);
- mitigation measures through the tendering process utilising the Crown Commercial Services (CCS) Selection Questionnaire (SQ) where mandatory exclusions apply of any bidder that has previously committed any offences under the Act. University contract management process including appropriate supplier approval questions and standard modern slavery compliance contract clauses.
- reserving the right to put on stop any supplier that fails to provide evidence that it is taking appropriate steps /measures to ensure the prevention of modern slavery and human trafficking.

What we are doing now

The University has undertaken a number of key steps in addressing the risks of slavery and human trafficking in our business and our supply chains.

We have;

- held meetings of the Modern Slavery Compliance Working Group, led by the Executive Director of Human Resources (as the Executive lead) with representatives from Finance, Procurement, Human Resources, Off Campus Division and Legal and Compliance. This working group is responsible for identifying, assessing and monitoring potential risk areas in our supply chains in addition to providing input into relevant policies and considering appropriate and proportionate ways of raising staff awareness;
- registered with the Government contracts database to receive guidance, resources, and up to date notifications on modern slavery reporting and legislation;
- signed up to the Home Office's modern slavery statement registry;

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- University representatives have attended regular training webinars offered by the Crown Commercial Service (CCS), and the Chartered Institute of Procurement & Supply (CIPS);
- annually revised and reviewed the University procurement documentation and processes to ensure that the University is up to date with developments in this area;
- continued membership via NWUPC with Electronics Watch, an organisation that helps public sector organisations work together, and collaborate with civil society monitors in production regions, to protect the rights of workers in their electronics supply chains. Representatives from the University regularly attend update meetings and webinars;
- annually review the University General Terms and Conditions of Purchase of Goods and Services to incorporate robust modern slavery clauses and bring contractual clarity to our expectations of suppliers with regard to the Modern Slavery Act 2015;
- included standard contract terms in other University contractual arrangements requiring compliance with our Modern Slavery and Human Trafficking Policy or ensure their own equivalent is available. We reserve the right to terminate contracts with immediate effect where the supplier commits a material breach. A material breach (i.e. a criminal offence) is identified as grounds for immediate termination with any other concerns or areas of improvement under the Act addressed with remedial processes discussed with the supplier;
- utilised various sources of information including the Global Slavery Index, Walkfree Foundation, CORE Coalition, and the CCS At Risk Framework Contracts Register to assess and monitor potential risk areas by sector, geographical location and product categories. These agencies also provide guidance and training materials.

What will we do next year

The University will continue to express its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working within them.

Therefore, as part of its ongoing commitment to reduce the risk of slavery and human trafficking occurring we will;

- continue to review key risk areas in our business and in our supply chains at a local, national, and international level;
- annually review our modern slavery and human trafficking arrangements taking into account any potential legislative changes;
- review our training to ensure a common level of understanding by raising awareness of modern slavery and human rights abuses by providing targeted and appropriate awareness training and guidance (to include; induction for new employees and line managers and refresher training for Heads of School / Service and commercial partners);
- utilise and disseminate relevant training materials from regional consortia (LUPC, NWUPC, etc.), Higher Education Procurement Association (HEPA), Chartered Institute of Procurement & Supply (CIPS), and Anti-Slavery Partnership Toolkit (hosted by Nottingham University);

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- promote the University approach to Modern Slavery and Human Trafficking and Public Interest Disclosure Policy to highlight where staff can raise issues of concern around this subject;
- ensure modern slavery and human trafficking continues to be referenced within the curriculum of relevant undergraduate and post graduate academic programmes;
- create a new repository of relevant and up to date guidance / support materials as a central source of information (published on the University Intranet) for use by Heads of Service / School and other stakeholders regarding modern slavery / human trafficking in the supply chain.

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

Dated: February 2023

Mr Chris McClelland, Executive Director of HR