

ANTI - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(Financial Year ending 31st July 2018)

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.

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 2018.

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

On 1 August 2018 Bolton College became a subsidiary of the University and part of the University of Bolton Group. This annual statement is made on behalf of the University, including any subsidiary companies.

In financial year 2016/17 the University had an annual turnover of £49 million. Our subsidiary does not have a turnover in excess of £36 million and so is not required to publish a separate statement.

The University is a teaching-focused, research-informed University with a global student body of circa 9,000 students including all campuses and affiliates and a total student body of circa 16,000 across the University of Bolton Group. There are approximately 1,278 members of staff employed across the University of Bolton Group.

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.

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 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.

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

To ensure a high level of understanding of modern slavery and human trafficking, the University has developed an anti-slavery and human trafficking policy which 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.

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

- **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.

[\(https://www.bolton.ac.uk/about/governance/policies/equality-diversity/\)](https://www.bolton.ac.uk/about/governance/policies/equality-diversity/)

- **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.

<https://www.bolton.ac.uk/about/governance/documents/>

- **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.

<https://www.bolton.ac.uk/about/governance/documents/>

Our supply chains and due diligence

The University expects the highest standards of conduct and probity throughout our business and supply chains. We work with a wide network of suppliers with over 2,000 active suppliers.

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 continues to take 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.
- Mitigation measures through the contract management process including appropriate supplier approval questions and standard anti-modern slavery compliance contract clauses.

What are we 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:

- an established modern slavery compliance Task Group responsible for identifying, assessing and monitoring potential risk areas in our supply chains, led by the Director of Human Resources with representatives from Finance (Procurement), Human Resources, Off Campus Division and Legal and Compliance;
- developed and implemented our anti-modern slavery and human trafficking policy;
- updated the University General Terms and Conditions of Purchase of Goods and Services to incorporate robust anti-modern slavery clauses and bring contractual clarity to our expectations of suppliers with regard to the Modern Slavery Act 2015; and
- included standard contract terms in other University contractual arrangements requiring compliance with our anti-modern slavery and human trafficking policy or have their own equivalent. We reserve the right to terminate contracts with

immediate effect where the supplier commits a material breach. Breach of the clause dealing with modern slavery is identified as grounds for termination.

What will we do next year

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 action to build on the steps already undertaken and will continue its commitment to reduce the risk of slavery and human trafficking occurring:

- undertake a supply chain mapping exercise and develop a system to identify, assess and monitor potential risk areas;
- categorise suppliers according to factors that might indicate a high risk of modern slavery, including the location from which services are provided or goods are manufactured and the sectors or activities which present a high risk of modern slavery;
- undertake a review of key risk areas in our business and in our supply chains;
- develop a modern slavery action plan that includes actions to mitigate any risks identified;
- review our training provision to ensure a level of understanding by raising awareness of modern slavery and human rights abuses by providing targeted and appropriate awareness training and guidance; and
- promotion of the University anti-modern slavery and human trafficking policy and public interest disclosure policy to highlight where staff can raise issues of concern around this subject.

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

Dated: November 2018

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