

**UNIVERSITY OF CUMBRIA**

**STATEMENT ON SLAVERY AND HUMAN TRAFFICKING**

**July 2016**

## **INTRODUCTION**

This statement sets out the University of Cumbria's position on modern slavery, its understanding of the risks and implications, and the steps that it is taking that aim to mitigate the risks and ensure that slavery and human trafficking do not exist within the University or within its supply chains.

As a provider of Higher Education, the University of Cumbria recognises its responsibility to take a robust approach to slavery and human trafficking. The University is committed to ensuring that there is no slavery or human trafficking in any part of the organisation or in its supply chains. In line with its mission statement and objectives, it is committed to acting ethically and with integrity in all its corporate and business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

This statement relates to the financial year 2015 – 2016.

### **1. Organisation's structure**

The University of Cumbria is a Higher Education Institution based in the north west of England, with campuses in Carlisle, Ambleside and Lancaster. It also has a campus in London. The University operates interests and activities from other smaller sites in the north west and elsewhere in the UK through partnership and collaboration arrangements with education providers and other organisations.

The University of Cumbria is a company limited by guarantee and a registered charity.

The overall responsibility for the strategy and control of the University of Cumbria rests with the University Board. The Board approves budgets and expenditure, and determines the educational character and objectives of the institution, as well as ensuring the effective and efficient use of the university's resources.

The strategic and operational management and day-to-day running of the University is the responsibility of the University Executive Group, under the leadership of the University Vice-Chancellor. The University Executive Group reports to the University Board through the Vice-Chancellor

The University has a single academic Deanery, headed by the Executive Dean, offering a wide range of undergraduate, postgraduate and professional development programmes, and an extensive research and consultancy portfolio. The Deanery operates through seven academic departments covering the disciplines within the University's academic portfolio.

Professional Services are delivered by eleven services departments.

### **2. University of Cumbria policies, processes and procedures on slavery and human trafficking**

The University is in the process of developing and approving a corporate Anti-Slavery and Human Trafficking Policy.

The University's Anti-Slavery and Human Trafficking Policy and Procedures reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place in our employment procedures or supply chains.

## **2.1 University Employees**

The Human Resources Service is responsible for the oversight, management and risk assessment of the recruitment and appointment of University staff, under the leadership of the Director of Human Resources and Organisational Development and reporting to the Chief Operating Officer.

Policies, processes and procedures are in place to support the HR activities in order to:

- Mitigate the risk of slavery and human trafficking occurring within the University by ensuring full compliance with UK Visas and Immigration (UKVI) "right to work" checks;
- Monitor and address any emerging issues of concern;
- Protect those raising concerns about possible instances of slavery and human trafficking.

Relevant University Policies, Processes and Procedures include:

- Staff Recruitment and Selection Policy Statement  
<http://staff.cumbria.ac.uk/Public/HR/Documents/HRHandbook/RecruitmentandSelectionPolicyStatement.pdf>
- Code of Conduct for Employees  
<http://staff.cumbria.ac.uk/Public/HR/Documents/HRHandbook/CodeofConductStatement.pdf>
- Public Interest Disclosure (Whistleblowing) Policy
- <http://staff.cumbria.ac.uk/Public/HR/Documents/HRHandbook/PublicInterestDisclosurePolicy.pdf>

## **2.2. University supply chains**

The University's Procurement Team is responsible for the oversight, management and risk assessment of suppliers and contractors, under the leadership of the Head of Procurement and reporting to the Director of Finance.

University supply chains include:

Laboratory Consumables and Equipment

Science and Medical Goods and Services

Professional Services

ICT Equipment and Services

Estates Goods and Services

Office Supplies and Services

### **2.2.1 Due diligence processes for slavery and human trafficking in supply chains**

Processes and procedures are in place to undertake due diligence on potential high-risk suppliers and conduct regular reviews of existing suppliers in order to:

- Identify and assess potential risk areas in University supply chains.

- Mitigate the risk of slavery and human trafficking occurring in University supply chains.
- Monitor potential risk areas in University supply chains.
- Protect whistle blowers.

### **2.2.2 New suppliers**

Appointment of new suppliers will take account of:

- Identifiable risks associated with a particular product or geographical area of origin;
- The general reputation of the supplier in terms of slavery and human trafficking risks;
- Drawing the supplier's attention to obligations within the contract with regard to slavery and human trafficking.

### **2.2.3 Review of suppliers and adherence to University values**

The University exercises zero tolerance to slavery and human trafficking. To ensure all those in the University's supply chain comply with University values provisions to ensure supplier compliance are in place, including:

- The University has made all its suppliers aware that the Modern Slavery Act 2015 may be a consideration for their business.
- A range of potential actions has been communicated with all the University suppliers that will support the University's supply chain in responding to the principles of the Modern Slavery Act 2015.
- All new procurement contracts will contain clauses requiring suppliers to take measures to prevent slavery and human trafficking.
- All suppliers are encouraged to register with the University's sustainability tool, 'Net Positive', to ensure that they comply with anti-slavery and human trafficking legislation.
- All high risk suppliers will be mandated to complete an Action Plan.
- The University will work with high risk suppliers to ensure they are compliant with anti-slavery and human trafficking legislation.
- All suppliers will be monitored and any concerns discussed with through the supplier contract management process.

The University's standard supplier terms and conditions will be modified to include provision to address continuing non-compliance by suppliers.

## **3. Risk Assessment and High Risk Activities**

The University has identified the following activities as high risk in terms of slavery and human trafficking:

- Employment of non-UK nationals on foreign visas
- Overseas suppliers
- Suppliers with whom the University has no previous history or knowledge
- Suppliers of goods in areas carrying material risks, including:
  - Office supplies
  - Laboratory consumables
  - ICT and AV equipment
  - Some estates services such as cleaning and security services.

## **4. Training and Awareness Raising**

To ensure a high level of institution-wide understanding of the risks of modern slavery and human trafficking in University business and supply chains, the University is developing training to be rolled out as mandatory to targeted staff including contract managers and HR staff. Training will include:

- Basic principles of the Modern Slavery Act 2015;
- Assessing the risk of slavery and human trafficking across the University's business;
- Overview of relevant University policies, processes and procedures
- Overview of University procurement and purchasing processes and practices and the prevention of unrealistically low price purchases, use of low-wage labour, provision of products by unrealistic deadlines;
- Identifying signs of slavery or human trafficking;
- What action to take when concerns about potential or suspected instances of slavery or human trafficking arise, and to whom within the University concerns should be escalated;
- Raising awareness and offering guidance around developing and implementing slavery and human trafficking policies with suppliers, contractors and partners;
- Measures that should be taken with suppliers or contractors who do not comply with requirements regarding slavery and human trafficking policies;
- Available external help and advice, eg. Modern Slavery Helpline;

As well as training targeted staff, the University will raise awareness of modern slavery issues by including information and guidance in manager briefings/other cascading channels and the circulation of information to all staff by email.

## **5. Measuring Effectiveness – Key Performance Indicators**

The University uses the following key performance indicators (KPIs) to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains:

- All University of Cumbria HR staff and contract managers to attend a training session within the year 2016-2017
- Establish use of sustainability tool for evaluating supply chain compliance by high risk suppliers by December 2016.

## **6. Next steps**

Following a review of the University's current processes and areas identified for development and improvement in the context of available guidance on the legislation, the University intends to implement measures as outlined in this statement to combat slavery and human trafficking and ensure that there is no slavery or human trafficking in the University or its supply chains

## **7. Approval and Signature**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the University Board of Directors. It constitutes the University of Cumbria's Slavery and Human Trafficking statement for the financial year ending 31<sup>st</sup> July 2016.

Signed by:

A handwritten signature in black ink, appearing to read "Evan Casty", is enclosed in a light gray rectangular box.

Designation: Chair of the Board of Directors

Date: 25 January 2017