

UNIVERSITY OF DERBY GROUP OF COMPANIES

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019

Introduction

Modern Slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, child labour, forced or 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 and is extremely prevalent across the globe. The International Labour Organisation ('ILO') estimates that there are 21 million people in forced labour in the world today and Walk Free Foundation estimates more than 40 million are victims of modern slavery. It is important that we do not deny or try to ignore the problem.

We are committed to improving our practices and policies, internally and throughout our supply chain, to combat slavery and human trafficking.

Organisational Structure

The University's core business is teaching and research. We have a student population of approximately 35,000 based in the UK and Overseas. There are circa 2,600 staff employed across the University Group including its subsidiaries.

The University has its main campus in Derby with a large University presence right across the city of Derby. Both Higher and Further Education is provided in Buxton, Leek and Chesterfield.

There are ties to many major employers and public service providers in Derby, Derbyshire and Staffordshire. In addition, there are partnership arrangements in place with both UK and Overseas education institutions. In the financial year of 2017/18 we had an annual turnover of £178m.

Our Supply Chains

The University of Derby is committed to conducting its business in a socially responsible and sustainable way and has invested in developing the Procurement Department to assist in supplier and supply chain management.

We work with a diverse range of over 3,000 active suppliers all of whom have to agree and sign up to our [Supplier Code of Conduct](#). For all tenders a declaration of compliance to Modern Slavery is confirmed by suppliers, this will be followed up regular audits but will be limiting for overseas suppliers.

Every competitive tender includes a requirement for the supplier to sign a Declaration of Modern Slavery Compliance and for risk or high value contracts, to respond to questions on the Ethical Trading Initiative (ETi) or have signed up to Net Positives / CIPS where it is relevant and proportionate to the subject matter of the contract. Net Positives and CIPS CSI index, are Supplier Engagement Sustainability tools for the Higher Education sector. They generate a sustainability action plan for businesses that is shared with the sector so suppliers do not have to repeat the same responses within different tenders. The suppliers are required to ensure their supply chain are ethical which includes aspects of Modern Slavery.

Our main supply chains fall under the following Categories:

Professional Services including agency staff, marketing, media and library
Estates and Facilities, construction, goods and services
ICT equipment and services
Corporate services and Technical

Our Risk Assessment

We have taken a risk based approach to identify commodities within the Categories that are a high risk for Modern Slavery and Human Trafficking, as a priority these are:

Cleaning Services
Catering
Security
Capital building projects – construction workers
Clothing
Furniture

Suppliers within these areas that supply to the University will be monitored under the Supplier Code of Conduct and spot checks/review meetings take place on a regular basis to ensure compliance to this Code. If any instance of Modern Slavery or Human Trafficking is suspected there is a [National Modern Slavery Helpline](#) to report these concerns. The University would direct anyone with concerns to the Helpline.

We are in the process of asking our preferred suppliers to undertake a supply chain mapping exercise to at least Tier 3 so that we can understand the ethical trading policies of downstream suppliers and/or manufacturers.

It is our intention to identify these risks according to country (base location of supplier and any other connected countries relating to the supply chain) and sector and Tier 3 supply chain mapping will assist us in formulating this Risk Mitigation Strategy. As new suppliers and commodity areas are identified a risk assessment will be undertaken and managed on a continuous basis.

Our policies

Several of our policies refer to Sustainability, Environmental, Fairtrade and National Minimum Wage issues but none specifically on Modern Slavery therefore it is our aim this year to develop a stand-alone Modern Slavery Policy, outlining our statement of intent on how we manage suspected Modern Slavery and how we will work with our suppliers to ensure any risk is mitigated.

A review of our existing policies will be needed to incorporate our proposed actions.

Our Due Diligence

In order to prevent and embed Modern Slavery awareness within our University and in our supply chains, the following due diligence processes are either undertaken now or are due to start this year:

- Any supplier refusing to agree to comply with the Supplier Code of Conduct will be removed from our supplier database;
- Contracts/Agreements will only be awarded if the supplier responds to the ETi questions or can demonstrate an understanding of Modern slavery and be able to identify risks within their supply chains;
- We will introduce Modern Slavery and Human Trafficking awareness as an Agenda item in our Procurement Team meetings and in our Fairtrade Steering Group with the possibility of having a separate Modern Slavery Working Group;
- We are encouraging more Fairtrade products within our Catering outlets including food, drink and clothing;
- Category Management has been implemented and is moving forward to embed Modern Slavery awareness within all our activities;
- We will undertake due diligence when using external framework agreements even though the expectation is that they have already ensured their goods, materials and labour-related supply chains are fully compliant, transparent, accountable and auditable, and free from ethical ambiguities;
- We will include our staff, students, business partners and suppliers in the efforts to eradicate practices and issues arising from and affecting Environment, Sustainability, Ethical Business practices, Modern Slavery and Human Trafficking;
- We have introduced a new Finance and Procurement system which ensures suppliers cannot trade with us unless they accept the Supplier Code of Conduct;
- We will look into working with the Walk Free Foundation who have a mission to end modern slavery in this generation.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to raise awareness by writing and filming a Podcast which will highlight what Modern Slavery and Human Trafficking is, how to recognise Modern Slavery inside and outside the University and what steps we are taking to mitigate these risks. This Podcast will be available for all staff and students, it will be embedded as part of our induction and training requirements and also advertised on our Intranet pages.

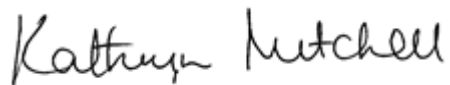
Procurement staff will complete the Chartered Institute of Purchasing and Supply's 'Ethical Procurement and Supply' on-line training on an annual basis.

How we Measure Effectiveness

We will measure effectiveness by monitoring how many staff have registered and viewed the Modern Slavery podcast. We will work with the Student Union and Student Experience teams to agree a method of monitoring the effectiveness within our student community. Other measures will include a Modern Slavery Working Group to sample audit high-risk suppliers on a quarterly basis.

Members of the University's Governing Council have reviewed this statement and gave its approval of the document in March 2019. It was then signed on behalf of Council by the University's Vice-Chancellor and Chief Executive.

Signed by:



Professor Kathryn Mitchell BSc, PhD, CPsychol
Vice-Chancellor, the University of Derby
March 2019