

UNIVERSITY OF BRADFORD

SLAVERY AND HUMAN TRAFFICKING STATEMENT

December 2018

Introduction

1. The University of Bradford is a higher education institution whose objects as set out in its Royal Charter are the “advancement of education and knowledge through teaching and research and the application of knowledge to societal welfare and in particular....teaching and research in technological, scientific, social and professional disciplines.... In addition to its national and international roles it shall have particular commitment to the economic and educational well-being of the city of Bradford and to the district and region” .The University has an annual turnover of approximately £110 million, approximately 10,000 students at home and abroad and just over 1,600 staff and purchases approximately £39 million per annum of goods, services and works through a variety of supply chain arrangements. The University is an exempt charity; its registered company number is RC000647.
2. The University’s values, as outlined in its 2015-25 Strategic Plan, include the application of the best ethical standards in everything that we do. Accordingly, the University is committed to employing staff, engaging with and supporting students, acquiring goods, services and works, and otherwise conducting its business in an ethical way and without causing harm to others. The University is committed to supporting the UK Government’s approach to implementing the UN Guiding Principles on Business and Human Rights.

Purpose of statement

3. This statement is produced to demonstrate the University’s compliance with Part 6 of the Modern Slavery Act 2015, by informing all members of the University community and other stakeholders about the University’s policy in relation to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains. The proposals and actions referred to in this Statement will be monitored through an action plan through an ad hoc working group.

Identified risks and mitigating actions

Employment of staff

4. The University has robust recruitment and selection procedures and the application of these procedures, together with the Code of Practice on Public Interest Disclosure (Whistleblowing) provides adequate mitigation of risk in relation to directly employed staff. The University is working towards a position whereby all temporary staff are recruited only through selected, established and accredited sources, who can provide assurance of full compliance with all legislative requirements in relation to the rights and welfare of candidates and employees.

Students

5. The University's Career and Employability Services provides details of part-time and temporary jobs, internships and placements; these opportunities and vacancies are screened to ensure compliance with minimum/living wage criteria for employment which falls within those criteria. The University has a variety of student support and advisory services to enable students to raise concerns. These are actively promoted and signposted throughout the student lifecycle.
6. Relevant staff (including, for example, those within the University's Student and Academic Services Department, officers and staff members within the University Students' Union and independent catering contractors), will receive role specific training briefings on the issues related to modern slavery (for example, relating to support for students should they present with related concerns). This is in addition to general staff training and awareness raising sessions referred to in section 16 below

Supply Chain

7. The University's supply chain has been identified as the area of highest risk in terms of possible occurrences of modern slavery and this sub-section sets out the mitigating actions that have been taken or are planned.
8. The University's procurement function is supported by a Purchasing Policy and terms and conditions for the procurement of particular categories of goods and services. The University has a Procurement Team who review annually in conjunction with other teams such as legal services the purchasing function of the University. This includes the relevant policies and terms and conditions of contract to ensure that they fully take into account the University's obligations in relation to modern slavery and human trafficking.
9. The University is a member of the North East Universities Procurement Consortium (NEUPC), which is in turn a member of Procurement England Limited (PEL), the shared vehicle by which English higher education purchasing consortia manage joint developmental and improvement projects for collaborative procurement in the higher education sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all PEL members are committed. The policy forms part of the supplier selection for the major contract procurement processes that are conducted for consortium members, ensuring that slavery and human trafficking are not taking place in the supply chain.
10. The following procurement categories have been initially identified as higher risk in terms of potential occurrences of modern slavery and human trafficking in the supply chain;
 - Science, Technical and Engineering Goods and Services, including laboratory and computing consumables;

- Security Services;
- ICT Equipment and Services;
- Estates/Facilities Goods and Services;
- Construction;
- Catering;
- Stationery and office equipment;
- Uniforms and Clothing;
- Domestic Services.

11. When procuring goods, works and services in the higher risk categories, the University in partnership with sector purchasing consortia, reviews potential suppliers to ensure that they can demonstrate a practical commitment to corporate and social responsibility.

Future Plans

12. The University is committed to a better understanding of its supply chains and will work towards greater transparency in this area in this and future years.

13. The University will map its suppliers, with the support of external specialist organisations, such as the purchasing consortia, Electronics Watch and People and Planet. It will build on the initial assessment outlined in paragraph 10 above, in order to identify supply chains in which there is a significant potential risk of modern slavery, human trafficking, forced and bonded labour and labour rights violations. Following such monitoring, appropriate action will be taken where necessary.

14. Through the procurement lead buyer initiative, the University will raise awareness of modern slavery and human trafficking considerations within specific, higher risk procurement categories. These considerations will then form part of the supplier selection process for goods, works and services in these categories .

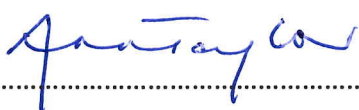
15. Many of our suppliers in the potential higher risk categories outlined above have committed to the Base Code of the Ethical Trading Initiative (ETI) <http://www.ethicaltrade.org/eti-base-code> and we will be working to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice which requires that;

- i) Employment is freely chosen;
- ii) Freedom of association and the right to collective bargaining are respected;
- iii) Working Conditions are safe and hygienic;
- iv) Child labour shall not be used;
- v) Living wages are paid;
- vi) Working hours are not excessive;
- vii) No discrimination is practised;
- viii) Regular employment is provided; and
- ix) No harsh or inhumane treatment is allowed.

16. A software system used by the HE sector has been assessed for incorporation within the procurement processes and will be a key step to ensure that the suppliers we are engaging with are producing or sourcing goods and services ethically with a focus on modern slavery elimination. Work is ongoing in identifying a supply chain structure however as the effectiveness of the software system is not fully known or demonstrating in terms of resource focus is on including relevant terms in contracts and agreements and the general contract terms and conditions and specialist IT term and conditions have both been reviewed.
17. The University has assessed both an online training tool and a targeted face to face training approach. We have adopted the face to face approach which will sit alongside general training and awareness raising measures in relation to modern slavery and this includes those staff identified in paragraph 6 above. The targeted areas for training are identified through the procurement and HR training teams and concentrate on staff who are involved in significant procurement or placements in particular risk areas which in turn depends on the nature of the contracts. The training will be assessed for effectiveness before identifying other areas for further training.
18. The University is reviewing its key performance indicators in line with Home Office guidance and work is ongoing to develop these within this statement. When staffing changes due to organisational change have bedded in further progress will be made. It has also reviewed its business structures and due diligence processes for incorporation within this statement.

Other Areas of Risk

19. Agreements which do not come within the commercial contracts supply chain dealt with by the procurement team and which are dealt with by the legal services team are reviewed and terms and conditions are included where appropriate for example in standard or ad hoc international recruitment and education related agreements. These are not considered to be high risk.
20. Any concerns or questions about matters related to this Statement should be addressed to the University Secretary in the first instance.
21. This statement has been reviewed and approved by the University's Executive Board and Council and will be further reviewed on an annual basis.

Signed: 

Date: 21 November 2018