

Committee:	Council
Title of paper:	Modern Slavery Act 2015 – Slavery and Human Trafficking Statement
<u>Classification:</u>	Restricted until approved
Action required:	For approval
Paper sponsor(s):	Andrew Keeble, Chief Financial Officer
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Date of paper:	28 October 2024 (cover sheet updated 15 November 2024)

1.	Purpose of the report
To seek approval of the University’s Slavery and Human Trafficking Statement (Appendix 1) and its publication on the University’s website by 31 January 2025.	
2.	Executive summary
The Modern Slavery Act 2015 (the “Act”) was introduced to provide law enforcement agencies with the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes, and enhance support and protection for victims. Due to the size of its turnover, the University of Essex is required to prepare an annual statement detailing activities undertaken to combat modern slavery and actions which will be taken in the future. The statement is required to be approved by Council as the University’s governing body.	
3.	Resource implications (financial, staffing, space, and equipment)
None.	
4.	Legal and regulatory considerations
Due to the University’s level of turnover, it is required by law to publish an annual statement on Slavery and Human Trafficking within six months of the end of its financial year.	
5.	Equality impact assessment
Progress will have a positive impact.	
6.	Consultation undertaken/required
Consultation has been undertaken with responsible procurement forums, the University’s People and Culture section, and the Essex Anchor Network. Ethics training, delivered by the Chartered	

Institute of Procurement and Supply, has also been undertaken.

The statement was endorsed by the University Steering Group on 5 November 2024 and, subject to the approval of Council, should be signed by the Chair of Council on behalf of the University.

7. Environmental impact and considerations

There are no environmental impacts as a result of this statement.

8. Analysis of risk

The publication of the statement is a legal requirement. Work is being undertaken to reduce the risk to the University and its reputation being unwittingly harmed by poor practice in its supply chain, or by its associations with others in its core business activity. This is a continual task due to the large number of existing and new suppliers to the University.

9. Recommendations

Council is asked to approve the University's annual statement on Modern Slavery and Human Trafficking statement for publication on the University's external website by 31 January 2025.

Modern Slavery Act 2015
Modern Slavery and Human Trafficking Statement

Summary

1. This paper seeks approval of the University's annual statement on Modern Slavery and Human Trafficking and its publication on the University's website by 31 January 2025. The paper also explains why this is a requirement and recommends follow-up actions that have been approved by the University Steering Group.

Background

2. The Modern Slavery Act 2015 (the "Act") was introduced to provide law enforcement agencies with the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes, and enhance support and protection for victims. Organisations are expected to undertake necessary checks and balances to ensure, where possible, they are not conducting business with other organisations that are engaging in modern slavery or human trafficking practices either directly or via their supply chains.
3. Section 54 of the Act contains a 'transparency in supply chains' provision. This requires certain organisations that supply goods or services and carry on a business or part of a business in the UK, including higher education institutions (HEIs), to produce and publish a yearly "slavery and human trafficking statement". This is currently limited to those with an annual global turnover of more than £36 million.
4. The annual statement is expected to include a report on the organisation's policies, training, due diligence processes and the effectiveness of the measures in place to tackle modern slavery and human trafficking. The statement needs to be reviewed annually and relate to the financial year just ended and must be approved and signed by the highest tier within the organisation within six months of the financial year end. The University of Essex is therefore required to make such a statement by 31 January 2025.
5. The University published its first statement in January 2017, making this the ninth such statement published by the University.

The Statement

6. As supply chains are key to the objectives of the Act, the development of an organisational statement is typically developed by the procurement function. This has tended to be the

case in the Higher Education sector. However, the statement should capture wider business of the organisation including its core business functions.

7. In order to understand more about the Act and how to develop the statement, the Central Procurement Unit (CPU) has:
 - Continued to undertake training provided by the Chartered institute of Procurement and Supply.
 - Reviewed examples from other HEIs.
 - Continued membership of the SUPC Responsible Procurement Action Group.
 - Engaged with other Public Sector bodies in Essex through the Anchor Network and the Procurement Agency for Essex.
8. Addressing the issue of Slavery and Human Trafficking is not simply about being able to produce a yearly statement. Developing good practice will also (a) reduce the risk to the University of being associated with those organisations who engage in unethical activity; and (b) promote the University as an organisation that is taking positive action.

Recommendations

- a) Council is asked to approve the University's annual Modern Slavery and Human Trafficking statement for publication on the University's external website by 31 January 2025.

Philip Sweeting

Director of Procurement

28 October 2024

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

The following statement is made by the University of Essex in acknowledgement of section 54(1) part 6 of the Modern Slavery Act 2015 and sets out the steps that the University has taken, and will be taking, to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our core activities.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

Our Organisation

Established in 1964, with the Royal Charter granted in 1965, the University of Essex has gained a global reputation for pioneering research which helps change lives. The University provides a research-led education which equips students with the curiosity and capability for personal and professional success. Our mission is to contribute to society through excellence in education and excellence in research.

Our spend categories and those that present risks of human rights abuses

The principal categories of spend which the Central Procurement Unit (CPU) deems as carrying material risks are laboratory consumables, ICT equipment and some estates services.

The corresponding source countries are as follows:

- Laboratory consumables, including gloves - Malaysia, Indonesia, India, Pakistan.
- ICT equipment - China, India, Mexico, Taiwan, Brazil, Poland, Czech Republic, Malaysia, USA, Ireland, Philippines, Japan, Vietnam, Thailand.
- Estates services including Cleaning and Security Services – mainly United Kingdom, although this is partially mitigated as many estates services are delivered by an internal team, rather than supply chain.

Most of our spend in these categories is purchased using collaborative framework contracts via the Southern Universities Purchasing Consortium (SUPC) and the London Universities Purchasing Consortium (LUPC). When procuring these services, SUPC and LUPC require the suppliers to commit to the Base Code of the Ethical Trading Initiative (ETI). The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour is not used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed.

The Consortia leads also make use of the Electronics Watch service, which monitors global supply chains relating to the production of electronic items, and Creditwatch to monitor financial issues which may indicate concerns. The consortia also manage each contract strategically, whilst the University of Essex manages its own relationships with the framework suppliers.

Our Policies and Actions to Prevent Slavery and Human Trafficking

The University has taken the following actions:

- Within our supply chain for the provision of goods, services and works, we include in all of our tendering exercises above £20,000, appropriate questions to suppliers related to Modern Slavery and Human Trafficking. This forms part of our assessment for a supplier's suitability for selection.
- Working in partnership with the University's Sustainability team, our Essex Food catering outlets have continued to increase the amount of Fairtrade/ Rain Forest Alliance certification tea and coffee as standard offerings, actively reduce the use of single use plastic and have increased the use of local suppliers.
- We require all potential new staff attending an interview at the University to provide documentation to demonstrate their Right to Work within the UK.

- We have refreshed our Modern Slavery and Human Trafficking policy relating to employment of staff within the University.
- We have continued to increase the use of frameworks where possible.
- More local suppliers with smaller, local supply chains have been implemented.
- Commenced work with a new framework supplier for temporary resourcing, focusing on IT.

Our Future Actions

During 2025, we will:

- Work with Estates colleagues to ensure a local supply chain is used where possible to minimise the risk of modern slavery relating to construction and maintenance.
- Work with DITS colleagues to ensure that when buying equipment modern slavery is thoroughly evaluated with supply chains and risks are understood wherever possible.
- Continue the use of the new temporary resourcing framework for other resourcing requirements.
- Continue to work with the relevant purchasing consortia, that where the University utilises the consortia frameworks, the suppliers on that framework have been appropriately assessed. CPU will continue to volunteer to be part of the evaluation team.
- Refresh our standard terms and conditions to achieve alignment to the new Procurement Act whilst ensuring modern slavery is taken into consideration in all contractual terms.
- Work with University Contract Managers to ensure modern slavery is monitored with existing suppliers, raising through the University's Contract Management forum managed by CPU.
- Ensure modern slavery is monitored on all contracts managed by CPU.

This statement will be reviewed annually to monitor progress in minimising the risk of modern slavery and human trafficking occurring in any part of the University's supply chains or core operations.



Melanie Leech

Chair of Council

January 2025