Introduction

Modern Slavery is a term used to encapsulate offences defined in the Modern Slavery Act 2015 covering slavery, servitude, forced or compulsory labour and human trafficking. Business organisations (universities are included within this definition) have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. The University of Warwick fully accepts these responsibilities and is committed to meeting its obligations under the Modern Slavery Act. The University publishes an annual statement setting out the steps it has taken to manage effectively the risk of modern slavery existing within either the University or its supply chain.

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 31 July 2016.

Raising Concerns

All members of the University are responsible for reporting concerns they may have of potential breaches of the University’s Modern Slavery Policy (see below) as soon as possible, whether on the part of other University members or third parties. Concerns may be raised directly with Heads of Department / Centre / Activity in the first instance or, where this is not felt to be appropriate, to the Secretary to Council. The University’s Whistleblowing Code of Practice also permits staff, students and anyone contractually associated with the University to raise concerns of serious malpractice in the University. Heads of Department / Centre / Activity or their representative must report any suspected breaches of the Modern Slavery Act to the Secretary to Council.

About the University

The University of Warwick is one of the UK’s leading universities, with an acknowledged reputation for excellence in research and teaching, for innovation, and for links with business and industry. The University has around 6,000 employees who are mostly based at our main campus in Coventry and Warwickshire. The University recruits students and staff from around the world in pursuit of academic excellence and it has many international links within the higher education sector and with commercial and other organisations.
This Annual Statement is made on behalf of the University group, including all our subsidiary and associate companies. The University turnover in 2015/16 was £574m. None of our subsidiary or associate companies have a turnover in excess of £36m and so are not required to publish their own separate statements. All of our subsidiary and associated companies are registered in the UK, with the exception of Warwick University Enterprises (Australia) PTY Ltd, which is registered in Australia.

Our Supply Chains

The highly-varied activities of a large, multi-disciplinary University necessitate the management of a diverse supplier base. For the purpose of this annual statement, the University defines its supply base as providers of goods, services or works for which the contracting arrangements are governed by the University’s Financial Procedure for Purchasing, which seeks to ensure transparency of process and achievement of best value.

The University’s supply base spans several broad category areas including: Construction, Laboratory Equipment, Catering, Professional Services, ICT, Facilities Management and Laboratory and Office Consumables. Across these categories, the University engages with a range of suppliers including large corporations and SMEs, both locally and internationally. It is recognised that the risk of Modern Slavery occurring will vary across these supply categories and the level of risk may also be impacted by a supplier’s size and location. For example, it is considered that larger UK registered suppliers, having a turnover in excess of £36m, may represent a lower risk of breaching the Modern Slavery Act as they themselves must publish an Annual Statement, and this might reasonably be expected to raise awareness and drive compliance with the Modern Slavery Act in those organisations and their supply chains. The University will therefore be developing a risk-based approach to mitigating the risk of Modern Slavery in its supply chain.

Compliance Work Undertaken in 2015-16

Initial steps have been taken to raise awareness of the requirements of the Modern Slavery Act within the University. Reports on the Act have been considered by the University Council (the governing body) and by its Finance and General Purposes Committee and Audit and Risk Committee. Senior Management are consequently fully briefed and a Modern Slavery Policy, which includes whistle-blowing arrangements, has been developed and published (see below).

The University’s tender documentation has been updated in response to the Modern Slavery Act. Suppliers engaged via formal tender procedures are required to confirm compliance to a set of standard principles in order to demonstrate their commitment to acting in a socially and ethically responsible manner. The University has also reviewed its standard terms and conditions for the purchase of goods and services, having sought appropriate legal advice to ensure the incorporation of robust anti-slavery clauses. It is anticipated that these updated terms and conditions will be
effective in the coming year, bringing contractual clarity to our expectations of suppliers with regard to the Act.

We have also undertaken a review of the Annual Statements on Modern Slavery for our main purchasing consortia, including the Southern Universities Purchasing Consortia (SUPC) and The Universities’ Catering Organisation (TUCO). Purchasing consortia exist to manage a robust procurement process, including appropriate due diligence, on behalf of their members. The University currently channels around 20% of its spend through consortia. Our review of consortia policies and annual statements has provided evidence that the consortia are, or are working towards, integrating the requirements of the Modern Slavery Act into their processes. This provides assurance that any suppliers on their frameworks are likely to carry a lower risk of the occurrence of Modern Slavery.

Several members of the Procurement and Insurance Office have already undertaken externally-provided training on the requirements of the Modern Slavery Act. The University also has access to sector-based advice from the Higher Education Procurement Association.

**Modern Slavery Policy**

The University is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of our organisation. We have developed a University Policy in response to the Modern Slavery Act 2015, which may be viewed at the link alongside this document.

In addition to our Modern Slavery Policy, the University has a suite of policies which support the protection of University members and third parties, demonstrate our values and underline our commitment to meet our public responsibilities, including the following:

- Dignity at Work and Study Policy
- Child Protection Policy
- Health and Safety Policies

In respect of Health and Safety, we have a code of conduct which contractors engaged by the University must adhere to. This includes a range of provisions to ensure that workers are protected and their rights are enforced, including the requirements that contractors must: (i) Satisfy themselves that they and anyone they employ or engage are competent and adequately resourced; (ii) Plan, manage and control their own work to ensure any workers under their control are safe from the start of their work on site, and (iii) Provide workers under their control with any necessary information they need to work safely, report problems and respond appropriately in an emergency.

The University also operates a Socially Responsible Investment Policy. We will use all reasonable endeavours to ensure that we operate our investment policy in a way that is consistent with a range of socially responsible aims, including the need to reduce and ideally eliminate corporate behaviour leading to the exploitation of workers.
Our Future Plans

In respect of our supply chain, the University plans to build on the steps already undertaken and will continue its commitment to reducing the risk of Modern Slavery occurring. In particular, we will develop a risk based approach to reviewing and monitoring our supply chain. We will continue to monitor tender responses, further enhancing our tender documentation as appropriate to seek assurance from prospective suppliers. We will embed the updated purchasing terms and conditions within procurement activities across the University. We will develop a communications programme to ensure that key stakeholders are aware of the responsibilities of the University under the Modern Slavery Act and to ensure that whistle-blowing arrangements are understood and well-publicised. We will continue to assess the ongoing training needs, in respect of the Act, of Procurement and Insurance Office staff, and other stakeholders where relevant, undertaking further training as required.

As the focus of our response to the Modern Slavery Act is primarily on our supply chain, this work will be led by our Head of Procurement and Insurance Services, reporting through the University Executive Board (via the Group Finance Director) to the University Council. Support from other professional specialisms, such as Legal and Human Resources, will be sought where appropriate. The University’s Annual Statement on Modern Slavery has been reviewed by Internal Audit prior to receiving approval by the University Council.