

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

The enactment of The Modern Slavery Act into UK law during March 2015 was a pivotal milestone in fulfilling the aims and aspirations to combat Slavery and Human Trafficking here in the UK. The legislation provided authorities and other agencies the legal power and framework required to offer protection and criminal consequences for people seeking to exploit others. The Act and its enforcement are a key attribute for building the structure for social justice within our society. This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes De Montfort University's Slavery and Human Trafficking Statement for the financial year ending 31 July 2021.

This Statement details De Montfort University's response to the Modern Slavery Act 2015 and offers an outline of key areas where Slavery and Human Trafficking are deemed a higher risk area for potential prevalence within the University's supply chain.

Organisational Structure

De Montfort University is a Higher Education Corporation established in accordance with the Education Reform Act 1988. We are a provider of education and research services and comprise four academic faculties:

- Business and Law,
- Health and Life Sciences,
- Computing, Engineering and Media,
- Arts, Design and Humanities,

together with a number of professional services directorates.

We have a global annual turnover of £234.6 million¹.

The University also has a subsidiary company, De Montfort Expertise Limited, through which its commercial activities are provided.

Collaboration and partnership working

The University is engaged with the Leicester, Leicestershire and Rutland (LLR) Combating Modern Slavery Group, linking with Leicestershire Police, and academic, business, and charitable community representatives to improve public awareness and the prevention of slavery and human trafficking.

The University is also engaged on the working group for modern slavery in public sector supply chains, linking with a broad range of public sector organisations and led by the Home Office, helping identify common themes and ideas for collaboration, to target reductions in modern slavery risks throughout the public sector.

The procurement function also collaborates and shares best knowledge and practice with procurement representatives from other universities and public sector bodies.

Our supply chains

The University's supply chains are in the main captured within the following high-level category groupings:

¹ DMU Income and Expenditure Account from the Annual Accounts 2020/21

- Estates (Hard and Soft Facilities Management) Works, Products and Services
- ICT equipment, products and services
- Professional Services
- Science, technical, engineering and medical equipment, products and services

Each of the category groups above have been considered and the following specific categories have been identified as having a higher potential susceptibility to Modern Slavery and Human Trafficking occurrence.

- Construction works sub-contractors and supply chains
- Estates; hard and soft facilities management services (such as maintenance, cleaning and security services)
- Food and catering
- Travel and accommodation (especially international)
- Office supplies/stationery
- ICT and Audio Visual (AV) equipment and products
- Laboratory and Personal Protective Equipment (PPE) supplies
- Clothing (sportswear and work wear)

The majority of the University's demand for office supplies and laboratory consumables is fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia. A wide range of products is procured across all of these categories, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. The Consortia requests many of the suppliers in these high-risk areas to commit to the Base Code of the Ethical Trading Initiative (ETI) and is working to persuade all suppliers in these categories to commit to the Base Code.

A significant proportion of the University's demand for ICT equipment and products, including parts and accessories is also fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia. The Consortia supports the principles of, and works closely with Electronics Watch and includes contract-monitoring clauses created by Electronics Watch in all relevant agreements awarded by the Consortia and used by the University.

Our policies on slavery and human trafficking

We are committed to avoiding and preventing modern slavery and human trafficking in our supply chains or in any part of our business. We have employment policies in place and codes of conduct, which have relevance to how this issue is addressed within our business by members of our staff.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere at the University or in our supply chains.

The University is continually working to improve its controls. Ensuring clear reference to modern slavery and human trafficking commitments within our procurement policies and

procedures while communicating these across the organisation, alongside procurement support and guidance material.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Supplier adherence to our values

We have a zero-tolerance approach to slavery and human trafficking. To ensure that all suppliers and contractors in our supply chain comply with our values we have the following procedures in place:

- a. We have a robust procurement policy, which forms part of the University's Financial Regulations approved by the University's Finance and Performance Committee, and which all staff at the University are obliged to follow. This policy is supported by a range of documented procedures, template documents, checklists and procurement guidance which include key content supporting management of the risks relating to modern slavery and human trafficking.
- b. Controls are in place within policies and procedures, which ensure that the tendering process for new suppliers and contractors and the management of the performance of, and relationship with, suppliers and contractors includes the provision and subsequent monitoring of compliance with the university's policies, including policies relating to slavery and human trafficking. Our supplier appraisal questionnaire also includes two declarations developed by Crown Commercial Services relating to the Modern Slavery Act 2015.
- c. This is further supported by the University's terms and conditions of contract, which include provisions whereby contracts can be terminated should a contractor breach such policies.
- d. Similar provisions are also contained within Higher Education Purchasing Consortia (and other) framework agreements used by the university. In the event that the University wished to use a framework agreement, which did not contain such a protection, it would seek to include such a provision by negotiation.
- e. Procurement templates exist and are annually refined to support active contract management. As part of this work, templates exist for Service Level Agreements (SLA) and Contract review meetings to help create consistency in staff considerations of slavery and human trafficking, throughout the contract lifecycle.

Training

The Procurement function looks to continually develop and refine its training offer, for the core procurement team and key internal stakeholders (such as those managing supplier relationships). This currently includes 7 online higher education sector e-learning modules including (i) a guide to modern slavery and (ii) protecting human rights in the supply chain, alongside a range of broad courses to upskill procurers and contract managers. Currently in

development is bespoke training videos to help staff to understand how to comply with policy, whilst using available tools and templates (including procurement checklists) to ensure key considerations, such as modern slavery, are factored in at an early stage (pre-contract) and throughout the contract duration.

Actions taken during the reporting year

The University has worked this year to focus on development of additional tools, templates and guidance material to further embed the new procurement policies and procedures established in the previous year. This has additionally enabled staff to better understand their responsibilities, particularly with regards to modern slavery and human trafficking. It provides greater clarity on our approach with both current and new suppliers, embedding our approach to validating their suitability. A key factor in this has been the development and frequent revision of mandated checklists that prompt areas of required consideration including modern slavery and human trafficking to ensure staff actively look to mitigate risks and engage the central procurement team for additional support where necessary.

Furthermore, the central procurement team has developed a sustainable procurement strategy, which is currently under final review with expected publication in the next financial year. This will help procurers understand key priorities for the University when undertaking procurement activity, such as ethically sourcing and reducing modern slavery, to help ensure all staff understand their obligations prior to awarding contracts. In addition, a toolkit is currently being developed to provide template questions (based on category of spend) and specific guidance, to make it easier for staff to understand the right questions to ask of suppliers to enable thorough consideration of modern slavery and human trafficking issues.

The Procurement team has also worked this year to actively highlight modern slavery risks related to Transnational Education developments, particularly reflecting the launch of DMU Dubai. This has led to a greater awareness of risks for senior staff at the University and driven discussion around varying operating models; particularly those that will limit our exposure to Modern Slavery risks, outside of our core operations in the UK.

As approved by the Board of Governors on Date: 25 November 2021



Signed by

Mr Ian Squires, Chair of the Board of Governors