

## **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 2020.

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 £253.9 million<sup>1</sup>.

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 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:

- 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

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<sup>1</sup> DMU Income and Expenditure Account from the Annual Accounts 2019/20

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 Human Resources Committee, and which all staff at the University are obliged to follow. This policy is supported by a range of documented procedures, template documents 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. A structured review and redevelopment of procurement templates supporting active contract management has been initiated following completion of new procurement policy and procedures. As part of this work, the standard Service Level Agreements (SLA) templates will be amended to include management of slavery and human trafficking risks as a key performance indicator, with a requirement that this is replicated through the contractor's own supply chain.

## **Training**

The Procurement function is developing its training offer for the core procurement team and for key internal stakeholders (such as those managing supplier relationships). This will include online higher education sector training that raises the awareness of modern slavery and human trafficking, alongside developing staff understanding of how to practically use developed tools and templates to help further mitigate risks in our supply chains.

### **Actions taken during the reporting year**

The University has this year established new procurement policies and procedures that enable staff to clearly understand their responsibilities, particularly with regards to modern slavery and human trafficking. This 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 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.

COVID-19 has this year greatly affected supply chains across the world, including that of the University. This year we have seen a growth in the need for key products (such as PPE and hand sanitiser) to enable the University to actively ensure that we minimise the health risk to both our staff and students. Alcohol-based sanitisers, distilled from sugarcane is an example of a product found to have involved child labour and modern slavery within its supply chains across Brazil, India, Mexico and Thailand. Given the need to expedite our sourcing approach in the face of the pandemic, the procurement team will be actively looking to challenge our key suppliers and their supply chains with the support of Higher Education and wider public sector purchasing consortia to understand any risk and ensure we are working with suppliers with robust sourcing platforms.

The effect of COVID-19 has also raised further concerns around the textiles industry, including within the city of Leicester. There have been examples of local factories putting staff health at risk due to high infection rates of COVID-19 within their workforce and forcing staff to attend work even when displaying COVID-19 symptoms. There has also been media coverage of high-profile clothing retailers - including factories within Leicester - found to have modern slavery within the upper tiers of their supply chains. Given the proximity of these recent incidents, DMU is pleased that its approach to sourcing clothing had previously been reviewed, enabling DMU to implement the requirement that all purchases should be made via approved consortia framework suppliers. This has helped greatly mitigate our risks within this category through platforms of third-party assurance.

Procurement services has undertaken in-depth supplier and contract reviews in the higher risk areas of ICT equipment/products and campus catering services. This has helped determine our current performance with key suppliers, in areas such as contract conditions, contract management and due diligence, which was then benchmarked against best practice suppliers, HE peers, and independent bodies such as Electronics Watch. The University has subsequently completed a report of findings to recommend both short and long-term measures that can be put in place to help further mitigate any risk in this area. This important work was undertaken through a student frontrunner placement, overseen by the University's Procurement Manager and Category Managers. This delivered additional benefits of developing advanced awareness and knowledge within the student base, subsequently helping our frontrunner achieve appointment to a procurement role in the Health Sector where they have a keen desire and support to cascade the knowledge and awareness they have gained of risks and best practice. In the coming Financial year, the University intends to undertake a further in-depth review of a different high-risk area with another frontrunner student placement, to help further review any potential supply chain risks and identify recommended actions.

As approved by the Board of Governors on Date: 16 December 2020

A handwritten signature in black ink, appearing to read 'Ian Squires', with a short horizontal line underneath.

Signed by

Ian Squires, Chair of the Board of Governors