

## Modern Slavery and Human Trafficking Statement

### Introduction

*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 31/07/2020.*

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.

We are committed to improving our practices to combat slavery and human trafficking.

### Organisational structure

The University of South Wales is a large multidisciplinary University based in South Wales with campuses Pontypridd, Cardiff, Newport & Dubai, The Royal Welsh College of Music & Drama and the College Merthyr Tydfil are wholly owned subsidiaries of the University but separate legal entities with their own Boards of Directors,

The University is led by its Vice Chancellor, Professor Julie Lydon, supported small Executive team and advised by her Academic Board. The University is a Higher Education Corporation and is governed by a Board of Governors with a majority of independent governors. Academically the University is organised into three faculties each with a number of schools. The University has around 30,000 students and is one of the largest, by student numbers in the UK.

### Our supply chains

The University meets its needs for goods, services and works in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment. The University's supply chains mainly fall under five 'super-categories', which are:

- Laboratory Consumables and Equipment
- Library Resources
- Professional Services
- ICT Equipment and Services
- Estates Goods, Services and Works

The principal categories which carry material risks are office supplies, laboratory consumables, ICT equipment and some estates services, such as cleaning services outsourced from time to time.

The University of South Wales is a member of the Higher Education Purchasing Consortium Wales (HEPCW). HEPCW works effectively alongside its counterpart UK Universities Purchasing Consortia and national groups, with which it enjoys progressive and successful relationships.

The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high risk categories listed above.

Many of our suppliers in these higher-risk categories have committed to the Base Code of the Ethical Trading Initiative (ETI) and the UK Universities Purchasing Consortia are working to persuade the remaining suppliers in these categories to join them. 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:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

## **ICT Equipment**

The University of South Wales participates in a number of ICT equipment collaborative purchasing agreements. Through these collaborative purchasing agreements, the University supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. We work with our contracted suppliers to implement and commit to new monitoring regimes where corporate codes of conduct and social auditing policies and practices are failing in their transparency and effectiveness.

## **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we will continue to review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Emerging government policy on ethical supply chains will also be considered by the University.

Our workplace policies and procedures will continue to 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 in our supply chains.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we will continue to put 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.

## **What we are doing now with regard to developing our policies:**

- We are working collaboratively as Welsh Universities on implementing the 12 commitments of the Welsh Government's Code of Practice to ensure that workers in public sector supply chains are employed ethically and in compliance with both the letter and spirit of UK, EU and international laws.
- We have re-drafted University Business Contracts to reflect the introduction of the UK Modern Slavery Act 2015 where suppliers will be required to comply with all the applicable laws regarding anti-slavery and human trafficking.
- We continue to regularly review our Procurement documents to reflect our commitment to act with integrity and ethically in all our business relationships and to implement and enforce effective systems and controls, including, in relation to, combatting modern slavery and human trafficking in our supply chains.
- Implementing a Contracts Repository – we have selected and will be implementing a contracts repository software solution, by end July 2021. The solution will enable us to identify risk types / areas and the Procurement Director to signpost where training and guidance on MSA is required and the subsequent responsibilities of managing and mitigating the risks.
- Reviewing and subsequently updating the University's standard terms and conditions of purchase which will include provisions concerning compliance with applicable modern slavery laws.
- We continue to review our Tender documentation to reflect the Modern Slavery Act 2015 which includes questions regarding bidders' policies and procedures to identify and eradicate forced labour in their own operations with subsequent review.
- Considering appropriate, effective and proportionate ways of raising staff awareness.
- Considering appropriate, effective and proportionate ways of raising supplier awareness both pre and post contract award.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we intend to raise awareness of modern slavery and human rights abuses amongst our staff and deliver appropriate training. Procurement staff continue to complete the Chartered Institute of Procurement and Supply (CIPS) 'Ethical Procurement and Supply' on-line training, or equivalent.

## **Further steps**

The University is committed to better understand its supply chains and work towards greater transparency and responsibility towards people working within them.

For contracts that we have awarded and participate in, we will identify those supply chains which represent a medium-to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, collaborative purchasing groups and other relevant organisations, we will continue to more closely monitor those supply chains that have been identified as a potential risk and take appropriate action if necessary.



**SIGNED:**

**Date:** 1 December 2020

**LOUISE EVANS**  
CHAIR OF BOARD OF GOVERNORS  
UNIVERSITY OF SOUTH WALES