

## 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 31/07/2024.*

Modern slavery is a crime. Within an organisation's supply chain, this can take various forms such as forced labour, debt bondage (or bonded labour), child slavery 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 continually improving our practices to combat modern slavery and human trafficking in all its forms across our organisation's supply chain.

### Organisational structure

The University of South Wales is a large multidisciplinary University based in South Wales with campuses in Pontypridd, Cardiff, and Newport. 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, Doctor Ben Calvert, supported by a small Executive team and advised by his 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 26,180 students and is one of the largest, by student numbers in the UK.

### Our supply chains

The University procures its need 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, the environment and the economy. The University's supply chains mainly fall under five 'super-categories', which are:

- Laboratory Consumables and Equipment
- Library Resources
- Professional Services (including international recruitment agencies)
- ICT Equipment and Services
- Estates Goods (including food and catering supplies), Services and Works

The principal categories within our supply chain which carry material risk of modern slavery and human trafficking are office supplies, laboratory consumables, food and catering supplies, apparel, ICT equipment, international recruitment agencies and some estates services, such

as cleaning services outsourced from time to time. These categories have been identified based on the country from which the goods are made and sourced, or where the procured service includes provision of a workforce to deliver the required service.

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.

Suppliers within these higher-risk categories who are part of these collaborative frameworks are required to commit to the Base Code of the Ethical Trading Initiative (ETI). For those who haven't yet joined the ETI, the Universities Purchasing Consortia continues to work to persuade them to join. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, which requires 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 continues to participate in a number of ICT equipment collaborative purchasing agreements. Through these, and where it is in place as part of the agreement, the University continues to support 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. Through this, we continue to 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 we have an organisational aligned approach to combat modern slavery in all forms within our supply chain or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our organisation and supply chain are slavery free, we 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 continues to be considered by the University which may change with a new UK Government in place.

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 modern slavery and human trafficking is not taking place anywhere in our supply chains.

We complete an annual review of our workplace policies and procedures. Any gaps identified or new requirements of government policy are incorporated, and the policies and procedures are refreshed and re published as required.

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

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

### **What we have done with regard to developing our policies and practices:**

- Within the procurement team structure, the role dedicated to supplier relationship management is now established and embedded; the remit includes understanding the risks in our supply chain.
- A Supplier Code of Conduct has been developed in alignment with the UKUPC Sustain Supply Chain Code of Conduct and is scheduled for implementation in 2024.
- We have taken steps and planned actions to enhance our policies and practices on modern slavery, with the intention of updating them in alignment with USW's Strategic Equality Plan.
- We hosted a student placement who conducted a review of our modern slavery risk via the supply chain; a second student has joined the team to work on integrating sustainable risk assessments into our procurement process.
- We have continued to work 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 ongoing access to the Transparency in Supply Chains website ([tiscreport.org/wales](https://tiscreport.org/wales)), to enable greater visibility of our supply chain's management of this risk in their supply chain.
- We continue to develop our working relationship with the Welsh Government team responsible for creating new policies for Welsh public sector bodies.
- The Procurement Director continues to work with the Welsh Government team responsible for Capability and Leadership within procurement teams across Wales, and is Chair of an associated working group. Through this, USW has insight and input into what support and training is offered to Procurement professionals in the Welsh public sector.
- The whistleblowing policy is now embedded in USW's policies and ways of working.

### **What we will do with regard to developing our policies and practices:**

- Continue to share our revised question set for use in tender documents with stakeholders, so the most appropriate questions are asked regarding bidders' policies

and procedures to identify and eradicate forced labour in their own operations with subsequent review and action plans.

- We will refine the sustainable risk assessment as part of our procurement processes, ensuring that our policies and practices align with our commitment to sustainability and ethical sourcing
- We will launch the UKUPC Sustain Supply Chain Code of Conduct, reinforcing our commitment to ethical standards and responsible sourcing across our procurement processes.
- We will build on the findings from the student placement's modern slavery risk review, using the insights to further strengthen and refine our policies and practices in addressing modern slavery risks within our supply chain.
- Continue to launch and monitor Net Positives to our supply chain, prioritising the suppliers who require a Modern Slavery Statement but aren't currently on Net Positives.
- For those suppliers who identify themselves as a 'high risk' of modern slavery in their supply chain, we will continue to review their information (if available) on the Transparency in Supply Chains website ([tiscreport.org/wales](https://tiscreport.org/wales)).
- Through the Supplier Relationship Manager role in the procurement team, we will review and refresh the roadmap of activities to further understand the risk in our supply chain.
- Continue to develop our plan to understand the risks associated with the supply chain not yet on Net Positives.
- Consider appropriate, effective and proportionate ways of raising staff awareness; we will sign post the Modern Slavery Act and our commitments in our induction programme, both for new Procurement team members and for all new members of staff.
- Consider 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 continue to raise awareness of modern slavery and human rights abuses amongst our staff and deliver appropriate training.

We have investigated the HEPA training programme for non- procurement staff and will roll out to stakeholders if appropriate and as required.

We continue to investigate what training solutions exist on Modern Slavery as a topic, for the USW Procurement team, our supply partners and other third parties. We continue to review the e- learning training modules available via the Government's Commercial College, and will roll out if appropriate and as required.

## **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.

**Modern Slavery and Human Trafficking Statement approved and agreed at the USW Board of Governors Meeting on November 25<sup>th</sup> 2024.**



**SIGNED:**

**Date:** 25 November 2024

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