

ANTI - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(Financial Year ending 31st July 2019)

Introduction

The University, as a charitable educational institution, has a zero tolerance approach to modern slavery within our business and supply chains and is committed to sound corporate governance acting ethically, with integrity, and improving our practices to prevent slavery and human trafficking.

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 31st July 2019.

This statement provides an overview of the steps the University has taken and continues to take to ensure that slavery and human trafficking does not take place within our business or supply chains.

Our Organisation Structure

In 2019, the Anderton Centre and UOB Services Ltd became subsidiaries of the University and part of the University of Bolton Group. This annual statement is made on behalf of the University of Bolton Group, including any subsidiary companies.

In financial year 2018/19 the University had an annual turnover of £61 million. Our subsidiaries do not have a turnover in excess of £36 million and are therefore not required to publish a separate statement.

The University is a teaching-focused, research-informed University with a global student body of circa 9,900 students including all campuses and affiliates and a total student body of circa 17,000 across the University of Bolton Group. There are approximately 1,478 members of staff employed across the University of Bolton Group.

Our main campus is located in Bolton and we have a number of well-established collaborative provision partnerships within the following countries: Botswana, Malawi, Zambia, India, Greece, Czech Republic, Germany, Vietnam, United Arab Emirates, China and Malaysia.

Our Policies

The University is committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our group structure.

We comply with all applicable employment law relating to employee terms and conditions, including pay. The University is an accredited Living Wage employer. This means that the University has committed to pay both employees and the staff of contractors and sub-contractors who work regularly on University premises in the UK at or above the Living Wage rate.

The University continues to support the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided wherever possible

- No harsh or inhumane treatment is allowed

To ensure a high level of understanding of modern slavery and human trafficking, the University developed an anti-slavery and human trafficking policy available at: <https://www.bolton.ac.uk/wp-content/uploads/2018/11/Anti-Modern-Slavery-and-Human-Trafficking-Policy-2018.pdf>, which reflects the University's commitment to acting in an ethical manner and to improve our practices to ensure the prevention of slavery and human trafficking.

Other policies that contribute to and support our approach and commitment to acting ethically and with integrity in all our business relationships include:

- **Equal Opportunities Policy:** encourages all members of our University community to value diversity and to respect each person's individuality and to ensure that no-one receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origins, sexuality or gender, disability, age nor religion or belief.

<https://www.bolton.ac.uk/about/governance/policies/equality-diversity/>

- **Public Interest Disclosure Policy:** offers individuals a confidential mechanism to disclose concerns of possible malpractice or impropriety to protect the organisation. This includes matters pertaining to our supply chain, which would include modern slavery and human trafficking.

<https://www.bolton.ac.uk/about/governance/documents/>

- **Anti-Bribery Policy:** sets out the University's rules and what is expected of all members of our University community, partner organisations and third party service providers in all dealings with us or on our behalf.

<https://www.bolton.ac.uk/about/governance/documents/>

Our supply chains and due diligence

The University expects the highest standards of conduct and probity throughout our business and supply chains. We work with a wide network of suppliers with over 1,300 active suppliers.

Our procurement processes provide that suppliers evidence a high level of corporate social responsibility during the tendering and selection process.

In order to mitigate any risk in terms of possible modern slavery the University continues to take the following actions:

- procurement is with suppliers that are pre-approved either through public tenders managed by procurement services within our Finance department or by purchasing consortia. The University is a member of the North Western Universities Purchasing Consortium (NWUPC), which is a member of Procurement England Limited (PEL), established for English higher education purchasing consortia to advance and improve collaborative procurement in the higher education sector. Together, the purchasing consortia have published a shared sustainability policy to which all PEL member consortia are committed. This policy contains conditions that form part of the supplier selection for the major contract procurement processes that are conducted for the consortium members, ensuring that slavery and human trafficking are not taking place in the supply chain;

- due diligence and site appraisals are undertaken for all new collaborative education provision partnerships with annual reviews thereafter;
- measures through the tendering process utilising the Crown Commercial Services (CCS) Standard Selection Questionnaire (SSQ) where mandatory exclusions apply of any bidder that has previously committed any offences under the Act. University contract management processes include appropriate supplier approval questions and standard anti-modern slavery compliance contract clauses.

What we are doing now

The University has undertaken a number of key steps in addressing the risks of slavery and human trafficking in our business and our supply chains.

We have:

- an established modern slavery compliance Task Group responsible for identifying, assessing and monitoring potential risk areas in our supply chains in addition to providing input into relevant policies and considering appropriate and proportionate ways of raising staff awareness, led by the Director of Human Resources with representatives from Finance (Procurement), Human Resources, Off Campus Division and Legal and Compliance;
- registered with the Government Contact Database to receive guidance, resources, and up to date notifications on modern slavery reporting and legislation;
- revised University procurement documentation and processes to ensure that the University maintains up to date with developments in this area;
- registered with Electronics Watch, an organisation that helps public sector organisations to collaborate and monitor regions to protect the rights of workers in their electronics supply chains;
- continued to develop our anti-modern slavery and human trafficking policy, taking into account any potential legislative changes post-Brexit;
- further updated the University General Terms and Conditions of Purchase of Goods and Services to incorporate robust anti-modern slavery clauses and bring contractual clarity to our expectations of suppliers with regard to the Modern Slavery Act 2015;
- included standard contract terms in other University contractual arrangements requiring compliance with our anti-modern slavery and human trafficking policy or have their own equivalent. We reserve the right to terminate contracts with immediate effect where the supplier commits a material breach. A material breach (i.e. a criminal offence) is identified as grounds for immediate termination with any other concerns or areas of improvement under the Act addressed with remedial processes discussed with the supplier;
- utilised various sources of information including the Global Slavery Index, Walkfree Foundation, CORE Coalition and the CCS at Risk Framework Contracts Register to assess and monitor potential risk areas by sector, geographical location, and product categories. These agencies also provide guidance and training materials.

What will we do next year

As part of the reporting exercise in this and the coming years the University expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working within them.

The University intends to take the following action to build on the steps already undertaken and will continue its commitment to reduce the risk of slavery and human trafficking occurring.

We will:

- invite and encourage all suppliers to register with the Crown Commercial Services and complete the Modern Slavery Assessment Tool (MSAT), a modern slavery risk identification and management tool. This tool has been designed to help public sector organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have procured. Public sector organisations are encouraged to use the MSAT with existing suppliers;
- continue to review key risk areas in our business and in our supply chains at local, national, and international level;
- continue to develop and update a modern slavery action plan that includes actions to mitigate any risks identified;
- continue to provide and review our training to ensure a level of understanding by raising awareness of modern slavery and human rights abuses by providing targeted and appropriate awareness training and guidance;
- utilise and disseminate relevant training materials from regional consortia (LUPC, NWUPC etc.), Higher Education Procurement Association (HEPA), Chartered Institute of Procurement & Supply (CIPS) and Anti-Slavery Partnership Toolkit (hosted by Nottingham University);
- promote the University anti-modern slavery and human trafficking policy and public interest disclosure policy to highlight where staff can raise issues of concern around this subject by providing a central source of information via the University Procurement website with dedicated guidance and training material available regarding all aspects of modern slavery and human trafficking.

This statement has been approved by the Executive Board and shall be reviewed annually.

Dated: November 2019

Approving Committee/Board	Executive Board
Reviewing Committee/Board	Executive Board
Circulation	Board of Governors



Dr Sue Duncan, Registrar and Chief Operating Officer