

Modern slavery and human trafficking statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st July 2018. This is our third statement under the Act and provides an overview of our continuing progress in this area.

We are a UK Higher Education Institution which provides a wide range of teaching, research and related activities. We are based in Manchester but are a global institution. We have 40,490 students registered on courses in the UK and across the world. We employ 12,470 people and have an annual income of more than £1 billion.

More information about us and our activities is available here: www.manchester.ac.uk

Our actions on modern slavery support one of our three core institutional goals (Goal 3: Social Responsibility) and we have a clear focus in this area:

- Our starting point is a zero tolerance approach to modern slavery and human trafficking and our internal policies and processes support this;
- Understanding our diverse supply base and the wider supply chain on which we rely through supplier engagement;
- Taking an informed risk based approach to prioritise what we do and target our actions;
- Promoting awareness and openness of the issue by sharing our experiences, collaborating within and outside the HE sector, and by taking opportunities to train our colleagues, suppliers, and others.

Our policies and processes

There is a clear chain of accountability for modern slavery; overall responsibility rests with the Board of Governors who have devolved day-to-day responsibility for implementing and monitoring the University's approach to the Director of Finance.

We have a zero-tolerance approach to modern slavery and a desire to behave ethically and with integrity in all our business dealings and relationships. 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. Our policies and procedures support this approach:

- As part of this commitment we have had an Anti-Slavery and Human Trafficking Policy in place since 2016: <http://documents.manchester.ac.uk/list.aspx>
- This year we have once again reviewed and updated our standard terms and conditions of business, strengthening our expectations around legal compliance including the requirement to adhere to our own Policy and the Modern Slavery Act 2015.
- The revision of our procurement documentation and processes is continual to ensure that they keep pace with developments in this area. We have embedded sustainable and responsible procurement practices and were the first HEI in the UK to be independently validated as operating at the highest level (Level 5) on the Flexible Framework in 2017. Over the last year we have reviewed the ISO 20400:2017 (Sustainable Procurement) and shared a comparison of this and the Flexible Framework with colleagues in the HE Sector.

We are committed to transparency in what we do and expect the same from our contractors, suppliers and other business partners, and their supply chains. We signed up to the TISC Report (<https://tiscreport.org/>) the world's largest open data repository of Modern Slavery and Human Trafficking Statements, in 2017. Unfortunately, due to technical issues our statements have not been visible through this portal and during the coming year we will rectify this omission.

Understanding and engaging with our supply chains

We have a large and complex supply chain to support our academic and ancillary activities. We purchase a diverse range of works, goods and services from more than 8,000 suppliers listed on our Finance System. Our suppliers cover almost every category of spend providing us with everything from aeroplanes (for research purposes) to Yorkshire puddings and anything in between. Regardless of what we buy we are committed to acquiring it in a responsible manner.

Understanding our suppliers and their supply chains is an essential part of our approach. During the year we have continued to use our on-line assessment tool to engage directly with all of our suppliers to identify their awareness of modern slavery and human trafficking. Every one of our suppliers and all new suppliers are invited to tell us about impacts arising from their business activities, including slavery within their supply chains. This provides an opportunity for them to tell us how they are addressing these issues. To date almost 1,600 suppliers have filled in this information, and we are using the insights this provides to ensure that we recognise, encourage and support good supply chain practice.

We are pro-active in engaging with our suppliers. In July we updated the on-line tool and amongst the changes were enhancements to the questions asked concerning modern slavery. As part of the refresh we contacted every supplier once again inviting them to update their information. Where suppliers had previously indicated that modern slavery was not an issue for their business the invite was accompanied by a reminder of the importance we attach to this area along with a link to our webpages which contain information on our approach and access to additional information. The revised format of the on-line tool will provide improved information in future years.

During the year we have undertaken a pilot exercise, in collaboration with The University Caterers Organisation (TUCO), in formal supply chain mapping with a small selection of catering suppliers. This proved to be more challenging than envisaged, though the lessons learned will be applied to an extended exercise over the coming year.

As part of our commitment to support our suppliers we hosted, in conjunction with colleagues from Greater Manchester's *Programme Challenger* and *Stop the Traffik*, an event as part of the National Crime Agency Week (14-18 May 2018) on Forced Labour. The session raised awareness of slavery and trafficking focused on the Manchester context and the University's approach. University staff attended alongside representatives from our construction supply chain. Opportunities to network and share experiences followed presentations from the University, the Greater Manchester Combined Authority and a University construction contractor. Feedback was overwhelmingly positive and the event has provided a blueprint for similar sessions in the future.

A risk based approach

We manage our suppliers using a category management model so that we can understand and manage risks within specific categories. Our high level supply chain risk is assessed using the UN Marrakech approach which provides a sound basis to focus our resources and actions. Effort is concentrated on categories and commodities that score highly on this and suppliers in the following areas (if not already captured) which have been highlighted elsewhere as being high-risk: agriculture, hospitality, construction, and staff agencies. Using this approach means we can target our limited resources to understand and promote best practice throughout all tiers of our supply chains.

We have updated our on-line resources this year to provide more help and guidance for our suppliers. In addition, working with our academic colleagues, we have identified that awareness of modern slavery is limited amongst many SME's and we have made available an initial briefing paper to help SME's deal with the issue within their business context. We intend to build on this over the coming year.

We continue to make use of a number of external standards and agencies to provide assurance on labour practices for applicable products and processes. We have maintained Fairtrade status since 2005 and affiliated with the Worker Rights Consortium in 2015. These provide independent sureties on supply chain practice, and we will continue to monitor the suitability of external validation in other areas as well.

As a user of a variety of external framework contracts we are working closely with two locally based procurement consortia: the North West Universities Purchasing Consortium (NWUPC) and TUCO, to understand and manage risks through contract management processes. We have agreed that the formal record of supplier site visits will be available for consortia members, and that future visits will include a visual inspection providing re-assurance around working practices including any signs of slavery. We expect to be able to report this in subsequent years.

Promoting awareness and training

Raising staff awareness of the problem of modern slavery remains a priority. Our award winning staff engagement programme (10,000 Actions) continues to provide access to specific guidance on our purchasing webpages including detailed information on slavery and human trafficking. This has been updated during the year and on-going analysis of our website traffic confirms that these webpages are regularly visited. In addition the Central Procurement Office has provided presentations to staff on the Modern Slavery Act and the University's response to it.

We have continued to build on the opportunities to link our academic research interests with our professional activities in the sphere of modern slavery, human trafficking and broader human rights issues within supply chains. On-going work between our professional procurement function and academic colleagues are proving fruitful and creating additional opportunities to combine research activity alongside practical day-to-day business functions. Often these joint activities provide an excellent opportunity to build effective networks and share with others results and experiences. This approach is unique to Universities and provides a good example of the positive contribution that our staff can make across a range of globally significant issues (including trafficking and slavery) emphasising the University's positive contribution to society more widely.

We actively engage with others in sharing best practice and keeping up to date on slavery and human trafficking considerations within the supply chain. We are heavily involved within Higher Education where our Head of Procurement chairs a sector wide Responsible Procurement Group whose remit includes modern slavery. The University also supports initiatives within our immediate region and was one of the inaugural members of the Greater Manchester Modern Slavery Business Network. This provides an opportunity to share ideas and experiences to tackle trafficking and its impacts within our city.

Specific training has been undertaken by our procurement professionals. Each of them has completed the CIPS Ethical Procurement and Supply course. In addition specific training, on modern slavery and human rights in the supply chain, has been provided to the Central Procurement Office by both *Stop the Traffik* and the *Ethical Trading Initiative*.



Mr Edward M Astle
*Chair of the Board of Governors
and Pro Chancellor*

Engaging our suppliers

All 8,000 of our suppliers have been invited to access our Supplier Engagement Tool and complete a sustainability action plan. To create a plan, they select issues apparent in their organisation, including those around modern slavery. Achievable actions are then suggested on the Tool to aid them in developing responsible practice and processes within their organisation. They are free to add, or delete actions and provide detail on how they are dealing with issues (including slavery) that impact on their business activities.

This data provides us with a rich source of information to use to help understand our supply chains, focus our activity as well as showcase and share good practice. This infographic shows what this data tells us about our suppliers and what they are doing to combat modern slavery.

Our Supplier Tool

As of 31/07/2018 we know that:



(CSR refers to Corporate Social Responsibility)

Modern Slavery Data



There is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations

All NEW suppliers have to confirm their activities to comply with the Modern Slavery Act and sign a statement before approval will be granted.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place.

Supplier Action Plans

	In progress	Completed	Not started	With evidence	
Develop a code of conduct which prohibits the use of forced or trafficked labour	12	9	31	4	2017
	17	21	41	19	2018
Publish your 'Modern Slavery Act Transparency Statement'	9	7	36	8	2017
	12	21	49	18	2018
Provide training for staff on modern slavery	11	3	36	8	2017
	15	9	54	16	2018
Engage with your suppliers on modern slavery	10	6	32	7	2017
	17	13	47	17	2018

Our High Risk Groups

	Estates and buildings	Computer supplies and services	Catering supplies and services	
Number of registered suppliers in each group	94	86	81	2017
	101	95	63	2018
Recognise modern slavery is an issue for their business	6%	6%	6%	2017
	10%	8%	3%	2018

Supplier Actions

Next steps...

