

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 2019. This is our fourth statement under the Act and provides an overview of our activities in this area.

We are a UK Higher Education Institution which provides a wide range of teaching, research and related activities. We were founded, and remain based, in Manchester but are a global institution. We have 40,140 students registered on courses in the UK and across the world. We are one of the largest employers in Greater Manchester with 12,695 staff and an annual income of more than £1 billion.

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

Our approach around the issue of modern slavery supports our institutional goals and commitments to social responsibility; this provides 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, students, suppliers, and others.

Our Policies and Processes

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

We expect all of our business operations, interactions and transactions to be carried out ethically and with integrity; we are clear with regard to our zero-tolerance approach to modern slavery. We are committed to working with our suppliers to ensure 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>
- Annually we review our standard terms and conditions of business; they require legal compliance with the Modern Slavery Act 2015 and also that our suppliers work with us in tackling modern slavery throughout our shared supply chains.
- Revision of our procurement documentation and processes is on-going to ensure that they continue to reflect best practice and support our objectives in this area.

We believe that transparency is essential, in driving up standards and highlighting all forms of human rights issues within supply chains, and we expect the same from our contractors, suppliers, 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. Following the resolution of technical issues, highlighted last year, our statements are again visible through this portal.

During the year we published details of how we are addressing the UN Sustainable Development Goals (SDGs) across all of our activities: research impact, learning and students, public engagement activity and responsible campus operations. Reinforcing our commitment to transparency, SDG 8: *Decent Work and Economic Growth*, provides additional focus for our activities to promote zero tolerance of forced labour, modern slavery and human trafficking as well as protecting labour rights and working practices more generally across our supply chains. More information can be found here: www.socialresponsibility.manchester.ac.uk/about/impact/sdgs

Over the coming year we will undertake a full, independent review of our policy, procedures and processes to ensure that they are appropriate and effective in responding to modern slavery. We will review our procurement activities in line with the SDGs to enhance transparency and coherent reporting.

Understanding and Engaging with Our Supply Chains

We have a large and complex supply chain to support our academic activities and campus operations. We purchase a very diverse range of works, goods and services and have in excess of 8,000 active suppliers listed on our Finance System. They provide us with items and services across almost every category of spend from apples to x-ray machines. Regardless of what we buy we are committed to acquiring it in a responsible manner.

Understanding our suppliers and their supply chains is a core component 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. Each and every supplier is encouraged to share with us details of the 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 over 1,800 suppliers have completed this information. The responses confirm that there remains a nervousness amongst suppliers over this issue but also provides evidence of positive supply chain practices that we can recognise, encourage and support. A snapshot of this data is provided on the accompanying graphic.

We have continued to work to map supply chains in high risk areas in conjunction with our contracted suppliers. Learning from previous experience we have tightened the focus of these exercises though they are still challenging to undertake. We hope to be able to publish some details of our work over the coming year.

In May 2019 as part of our commitment to support suppliers we hosted another event to raise awareness of slavery and trafficking within supply chains. We held this in collaboration with colleagues from The University Caterers Organisation (TUCO), and invited attendees from nationally contracted catering providers. The session was well attended with presentations from the University, TUCO, Programme Challenger, as well as a leading lawyer and a supplier. Opportunities to network and share experiences followed the presentations and feedback was very positive. We will look to hold 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 reviewed and updated our on-line resources this year to provide more help and guidance for our suppliers. Building on our previous work, in conjunction with academic colleagues, we have re-drafted guidance for SMEs to assist them in addressing modern slavery within the context of their own businesses. We showcased this at a regional event, and are aware that some of our contracted suppliers are cascading this guidance down their own supply chains.

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.

This year has seen two significant developments in this area:

- In March 2019 we were officially accredited with the Living Wage Foundation (LWF). This is a positive step in demonstrating good labour practice. Whilst we have long paid our own staff more than the minimum hourly rate recommended by the LWF we are now able to use this national forum to promote and encourage good employment practices amongst our supply chain partners.
- In June 2019 we became the first higher education institution to join *Slave Free Alliance*, part of *Hope for Justice*, a Manchester-based charity. It exists to bring an end to modern slavery by preventing exploitation, rescuing victims, restoring lives and reforming society. By joining *Slave Free Alliance* the University has joined a global movement, demonstrating commitment to raising awareness of modern slavery and working to promote a zero tolerance approach to the practice in our supply chains. We will be working closely with *Slave Free Alliance* over the coming months to review our progress to date and to seek opportunities to engage and educate our staff and students.

These memberships and affiliations provide independent sureties on supply chain practice, and we continue to monitor the suitability of external validation in other areas as well.

We are, for example, currently investigating membership of Electronics Watch (EW). EW exists to assist public sector organisations to monitor rights of workers in the electronics industry. For a number of years most of our expenditure on IT equipment has been through bespoke sector frameworks let by the London Universities Purchasing Consortium (LUPC) which was a founder member of EW but individual membership would reinforce our commitments in a high risk area.

As a user of a variety of external framework contracts we continue to work closely with two locally based procurement consortia: the North West Universities Purchasing Consortium (NWUPC) and TUCO, to manage risks through contract management processes. As reported last year both consortia have incorporated a visual inspection, providing assurance around working practices to include any signs of slavery, as part of their supplier site visits. Over the course of the year the NWUPC have attended 4 supplier premises and TUCO have undertaken 19 visits; no issues or concerns have been reported.

Promoting Awareness and Training

Raising staff awareness of the problem of modern slavery remains a priority. Our staff engagement programme has been reviewed and refreshed during the year and the module on responsible procurement has been revised. Amongst changes are the inclusion of a link to a video from the *Gangmasters and Labour Abuse Authority* (GLAA) and access to updated guidance on our Central Procurement Office (CPO) webpages related to slavery and human trafficking. Evidence shows that our staff continue to actively engage with the content that the programme provides. This is confirmed by analysis of the traffic on our CPO webpages; these have seen an increase in the number of visits over the year and also an increase in the average length of time spent viewing the information they contain.

We have continued collaboration between our academic research and our professional activities in the sphere of modern slavery, human trafficking and broader human rights issues within supply chains. Our CPO benefitted from an internship from a PhD student from the Alliance Manchester Business School (AMBS) who was able to assist in assessing risks and engaging with suppliers across our laboratory and medical spend category. Academic and procurement colleagues are working together on several initiatives and jointly presented to business representatives from across the city at the event

in March detailed below. This highlights the ability of Universities, like ours, to combine cutting edge research with practical application and to build effective networks to share ideas and develop understanding of key issues like slavery and trafficking.

We have continued to engage widely: sharing best practice and keeping up to date on slavery and human trafficking considerations within the supply chain. Within the Higher Education arena our Head of Procurement continues to chair a sector wide Responsible Procurement Group whose remit includes modern slavery. Our procurement team also attended the inaugural meeting of the Universities Against Modern Slavery Alliance (UAMSA) in London in March 2019.

The University continues to support initiatives within our immediate region particularly as a member of the Greater Manchester Modern Slavery Business Network. We hosted a meeting of this group in March 2019 at the AMBS. The focus of the event was how larger organisations can support their supply chain partners and especially SMEs. In July our Deputy Head of Procurement attended a panel session at the Greater Manchester Chamber of Commerce Construction Summit, alongside two of our contracted construction firms, to discuss slavery and supply chain issues to businesses from across Greater Manchester. Events such as these raise awareness and provide opportunities to explore issues and experiences to tackle trafficking and its impacts within our city.

All of our central procurement team are professionally qualified and have completed The Chartered Institute of Purchasing and Supply Ethical Procurement and Supply course during the last 12 months. In addition several have attended relevant training courses addressing responsible procurement and various aspects of modern slavery and human rights in a purchasing context.



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

Engaging our Suppliers

All of our suppliers have been given the opportunity to complete our on-line assessment tool; this lets them tell us about the impacts (positive and negative) across the range of their business activities. As at July 2019 over 1,800 have filled this in and have told us about aspects of their operations including their approach to modern slavery. The information provided helps us to better understand our supply base and the issues that they face. The data constitutes a rich source of information that allows us to assess the level of awareness, of modern slavery and human trafficking, as well as the range of responses to it within our supply chains.

The tables on the right provides a snapshot of this data.

Some examples of what our suppliers have told us...

Training was introduced in 2016 for members of staff with responsibility for sourcing and managing suppliers and other staff to whom it was relevant. Further training continues with all new starters.

We recently (June 2019) organised the training of 40 key managers and leaders in recognising and responding to signs of Modern Slavery, as well as the steps that can be taken to minimise the risk of slavery in our global supply chains.

We have a Board statement outlining our intent to eliminate any potential for modern slavery within our extended network. We have partnered with *Stronger Together* to use multi-lingual videos and literature to get the message across all levels of our business.

Over the coming year we will...

- Undertake an independent review of our policy, procedures and processes to ensure that they are appropriate and effective in responding to modern slavery and human trafficking.
- Continue to raise awareness of modern slavery issues amongst our suppliers, staff and students. Encourage transparency amongst our suppliers and continue to work with our formally contracted suppliers to understand their supply chains through completing our engagement tool.
- Continue to demonstrate leadership in the area of responsible procurement and collaborate widely to ensure a zero tolerance approach to modern slavery within the procurement community.

Engagement with our suppliers continues to grow:

Our Supplier Tool	2018	2019
Suppliers who have completed sustainability action plans	1,595	1,867
Suppliers who have actively engaged with the Tool	1,311	1,537

Of these suppliers we know that:

Our Supplier Tool	2018	2019
They have a head office outside the UK	18%	18%
They source >25% of goods / services they provide outside of Europe	22%	21%
They have a dedicated lead for Corporate Social Responsibility or sustainability	33%	32%

Our suppliers are increasingly aware of the issue:

Modern Slavery Data	2018	2019
Businesses are aware of the Modern Slavery Act	93%	95%
Businesses felt Modern Slavery is an issue for them	5%	8%

Of suppliers who are aware of the Modern Slavery Act we know that:

Modern Slavery Data	2018	2019
They have a head office outside the UK	16%	14%
They source >25% of goods / services they provide outside of Europe	34%	29%
They have a dedicated lead for Corporate Social Responsibility or sustainability	47%	46%
They are an SME	72%	76%

Supplier action plans demonstrate positive progress in addressing the issue:

Supplier Action Plans	Actions accepted but with no details provided		Actions accepted and in progress with details provided		Actions accepted and marked as completed		Actions accepted as in progress or complete with evidence	
	2018	2019	2018	2019	2018	2019	2018	2019
We Engage with our suppliers on Modern Slavery	47	85	17	32	13	27	17	30
We publish a 'Modern Slavery Act Transparency Statement'	49	86	12	16	21	42	18	32
We provide training for staff on Modern Slavery	54	95	15	23	9	26	16	28
We adopt a robust approach to removing Modern Slavery from supply chains	41	72	17	31	21	41	19	36

This is also reflected amongst our suppliers in high risk areas:

High Risk Areas	Construction		IT		Catering	
	2018	2019	2018	2019	2018	2019
Number of registered suppliers in each group	101	128	95	128	63	75
Suppliers recognising that Modern Slavery is an issue for their business	10%	12%	8%	13%	3%	13%