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# 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 2021. This is our sixth statement under the Act and provides an overview of our risks and actions in this area. Our activities have been heavily affected during the year by the Covid-19 pandemic with normal campus operations suspended for the whole period. In line with lockdown restrictions much of our teaching and research has been undertaken remotely and on-line.

Changes resulting from this altered operational activity has impacted our spending patterns and risk profile, in respect of modern slavery, over the year. For example we have fewer building projects in progress, with resultant reductions in estates spend, and little campus activity reducing spend on catering commodities, but have invested in IT and accessories, to support remote learning, so spending has increased under this category.

Our report is structured in line with the requirements of the Modern Slavery Act 2015.

## Our Organisation Structure, Business and Supply Chains

We are a UK Higher Education (HE) Institution which provides a wide range of teaching, research and related activities. Social responsibility is recognised equally, as one of core goals, alongside our academic aims. We are physically based in Manchester, where our main campus is located, but our research and collaborative activities take place across the world. In 2021 we had 40,485 undergraduate and postgraduate students mostly based on our campus, but with a number studying outside the UK. We are one of the largest employers in Greater Manchester with 12,920 academic and support staff and an annual income in excess of £1 billion.

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

We are structured around three academic faculties comprised of individual schools: Biology, Medicine and Health (with 3 schools), Humanities (with 4 schools) and Science and Engineering (with 2 schools). In addition we have twenty four cross-disciplinary institutes. The University encourages work across disciplines to drive innovation and collaborative approaches in research, teaching and social responsibility activities. A Professional Services structure provides administrative support. Our organisation is explained on our web-pages: <https://www.manchester.ac.uk/discover/structure/>

In respect of modern slavery we have two main risk areas;

1. People: our large population of staff and students. Our demographic is very diverse but naturally encompasses a large number of young adults. Whilst most of our undergraduate students come from the UK we also have a large international student population. The welfare of our staff, students and visitors is our highest priority.
2. Supply chains: we have over 300 buildings on our main campus used for a wide range of teaching, research and support activities. To facilitate this we have a large and complex supply chain from which we purchase a diverse range of works, goods and services. Over the year we transacted with over 6,000 suppliers and had an invoiced spend of approximately £491 million. As an organisation we are committed to spend our money in a responsible manner.

## Our Policies and Processes relating to Slavery and Trafficking

Our modern slavery approach is consistent with our foundation as a civic organisation, established for public benefit, and with our mission which is to: enhance society through our established programmes for teaching, research and social responsibility. As an institution we are committed to equality and inclusion and have a zero tolerance approach to slavery and human trafficking. Our internal policies and processes support this by;

* Integrating modern slavery actions within our well established risk management structures including our welfare and safeguarding procedures;
* Constantly challenging, and extending our understanding of, our diverse supply base and the wider supply chain on which we rely through a formal process of supplier engagement;
* Making the most of our limited resources by using an informed risk based approach to prioritise what we do and target our actions;
* Being open and honest about what we do: promoting awareness and by sharing our experiences, collaborating within the HE sector, and beyond, and through training our colleagues, students, suppliers, and others.

The University has in place a clear chain of accountability for modern slavery; overall accountability rests with our Board of Governors who have devolved day-to-day responsibility to the University’s Professional Services function.

Review and oversight of this area is integrated within the portfolio of the Director of Risk and Compliance. Actions, across the University, are co-ordinated by the Director of Risk and Compliance with support from senior colleagues within the following Professional Services Directorates: Finance (Central Procurement Office), Human Resources, Legal Affairs, Student Experience, and Social Responsibility. This ensures full coverage of the University’s activities and risks in this area.

The University expects staff to abide by the seven principles of behaviour on Standards in Public Life (‘Nolan Principles’) and requires that these be upheld within day-to-day activities. This includes our clear commitment to a zero-tolerance approach to modern slavery and our efforts to ensure that there is no modern slavery within any part of our business. We continue to work with our tier one suppliers to reduce the likelihood of modern slavery, or human trafficking, in the supply chains on which we rely to deliver our business objectives.

Our policies and procedures underpin this:

* We have had an Anti-Slavery and Human Trafficking Policy in place since 2016: <http://documents.manchester.ac.uk/list.aspx>
* We have a well-developed approach to all aspects of safeguarding that recognises the risk of slavery and we are planning to bolster this with a formal Adult Safeguarding Policy;
* We review our standard terms and conditions of business annually. These 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;
* We continually review our procurement documentation and processes to ensure that they reflect best practice and support our objectives in this area. Our expectations are set out clearly in all of our documentation including:
	+ Our Procurement Policy which outlines our commitment to responsible procurement. This sets expectations around legal compliance including modern slavery. It also makes specific reference to the UN Sustainable Development Goals (SDGs). For example *SDG 8: Decent Work and Economic Growth*, highlights a zero tolerance of forced labour, modern slavery and human trafficking by encouraging the protection of labour rights and working practices across supply chains.
	+ Our Supply Chain Code of Conduct, a common document in use across the HE sector, also makes clear reference to the SDGs. Collaborating through a sector wide approach reinforces the expectation of positive behaviours with regard to social, ethical, economic and environmental practices to be demonstrated by our suppliers and their associated supply chains.

We maintain a commitment to transparency as a means of driving up standards and highlighting human rights issues within supply chains. We expect our contractors, suppliers, and their supply chains to be similarly open about their operations. We signed up to Transparency in the Supply Chain (TISC) – the world’s largest open data repository of Modern Slavery and Human Trafficking Statements – in 2017 and became a Public Partner in 2018 and our annual reports are available through their portal: <https://tiscreport.org/>. In 2021 we also signed up to the new UK Home Office Modern Slavery Statement Registry and our annual statements can now also be found there: <https://modern-slavery-statement-registry.service.gov.uk/>

Our institutional commitment to combating modern slavery is demonstrated by our membership of Slave Free Alliance (SFA). We joined SFA in 2019 as the first HE member. Our involvement with this charity provides an independent view of our progress in this sphere, access to information and shared experience, as well as helping to support victims of slavery and trafficking.

## Our Approach to Understanding and Managing Risk of Modern Slavery

As outlined above the two main risks areas for the University, in terms of slavery and trafficking, relate to people and supply chains.

The people issue is addressed by integrating modern slavery activities within our wider risk management framework and covering specific risks through existing safeguarding structures. This is an evolving area with material in development:

* Senior staff are appraised of modern slavery issues as part of the annual programme of risk and compliance training;
* Building on our existing Prevent Programme network and processes to help to ensure that appropriate action is taken should any trafficking or slavery incidents be discovered;
* Adequate publicity and information is available across our various communication platforms to highlight modern slavery risks.

In addition the University will work with its Student Union to explore ways to raise the profile of the issue within the student body and work together to make our campus a hostile space for modern slavery and trafficking.

We have been working for a number of years to understand our supplier and supply chain risks. This is a difficult and constantly evolving area. We recognise that there is a likelihood that embedded somewhere within parts of our extended supply chains that some form of human exploitation is present. This knowledge strengthens our commitment to oppose this behaviour and to work with our supply base to take steps to prevent such abuses from happening.

We rely on a number of due diligence processes to vet and manage our suppliers and their products. First is to ensure that we contract with suitable and responsible suppliers. As a complex business we have a large and diverse supply base to enable us to carry out our wide range of academic and campus support operations. During 2020-21 we had 6,228 active suppliers on our Finance System. This supplier list is not static and in a typical year around 1,200 suppliers will be on-boarded and a similar number retired.

Most of our spending is with a cohort of around 900 formally contracted suppliers. Each of these is appointed either directly by the University or through an eligible public sector framework agreement. In either case suppliers are subject to a formal selection process to ensure that they are suitable to meet our needs. The evaluation considers the capability and capacity of organisations to supply what we require and includes assessment of, amongst other things, their supply chain practices and adherence to modern slavery legislation.

We make use of a number of external standards and agencies to provide assurance on labour practices for applicable products and processes. Of relevance to high risk purchasing categories and concerns around slavery and trafficking are the following:

* We have maintained Fairtrade status since 2005.
* We have maintained accreditation with the [Living Wage Foundation (LWF)](https://www.livingwage.org.uk/) since 2019.
* We affiliated with [Electronics Watch (EW)](http://electronicswatch.org/en) as a member of our regional purchasing consortium (NWUPC) in 2019.
* We signed-up to the [Gangmasters and Labour Abuse Authority (GLAA)](https://www.gla.gov.uk/) construction protocol in 2019.

Working with these organisations helps us to demonstrate good practice in our own business and encourages it amongst our contracted suppliers and their wider supply chains.

Membership also provides access to monitoring and reporting including specific examinations of workforce practice in factories and production facilities. During the year EW have reported on conditions in factories producing IT components information that has been helpful given our increased spend on these items. We have also had access to information from Slave Free Alliance on the use of forced labour in the production of certain commodities which affects a number product ranges.

Oversight of potential issues with suppliers and supply chains is maintained through two mechanisms: (1) ongoing contract management processes, and (2) ongoing supplier management practices.

We manage all contracts to ensure compliance and continued delivery. In making use of a number of collaborative public sector framework agreements, let by external contracting bodies, we are able to rely on high level contract management arrangements carried out by each letting organisation. This includes continued evaluations of company capability and capacity as well as reviews of business practices which provide continued assurance for users of these contracts.

Our Central Procurement Office (CPO) continues to work closely with two purchasing consortia based in Manchester: the North West Universities Purchasing Consortium (NWUPC) and The University Caterers Organisation (TUCO), to manage risks through their contract management processes. These include physical site visits for companies based in the UK. These site inspections include a visual review of premises and observed working practice by staff alert for possible signs of slavery. To date no concerns have been raised as a result of these inspections which provide reliable physical reassurance that actual working practices continue to meet our expectations.

Our local supplier management processes supplement these where necessary. We actively managed our contracted suppliers in three main ways, through: (1) a formal category management approach, (2) local contract management and (3) an active supplier engagement process.

Suppliers are classified using a category management approach. This means we are able to understand and review risks within specific categories of spend. High level supply chain risk is assessed using the UN Marrakech risk methodology which provides a sound means of focussing resource and effort. Priority is given to categories that score highly in this, and further detail on what this looks like for our supply base can be seen on our CPO web-pages. Working in this way means we can target our limited resources with our tier one suppliers focussing on understanding and promoting best practice. We can cascade this further down supply chains as required. For example we have imposed obligations around the appointment of sub-contractors with our construction partners appointed to deliver large construction projects.

Formal contract management is carried out for all of our contracts. This includes meetings with suppliers to discuss contract delivery as well as other aspects of their business that affect us. Supply chain practice is a standing item on our supplier meeting template including a review of information provided via our on-line supplier engagement portal.

It is important for us to understand our suppliers and their supply chains. Central to this is our continued use of our on-line assessment tool to engage with our suppliers to assess their approach across a range of economic, social and environmental issues. During the year this system has been refreshed with additional questions added around supply chain practice. Each and every supplier is encouraged to share with us details of the impacts resulting from their business activities including slavery and human trafficking within their direct business and associated supply chains. This provides an opportunity for them to tell us what actions they are taking to address these issues. To date over 2,100 suppliers have completed this information. A snapshot of this data is available on our CPO web-pages.

Support is also available for our suppliers through our CPO web-pages. The content is reviewed regularly and includes a clear explanation of why this is important to us and why we expect our suppliers to show a similar commitment to improving working conditions within our mutual supply chains. Usage metrics show that external visits to our supplier and modern slavery pages remain relatively high.

Supply chain mapping is an ongoing activity particularly in high risk areas. This is a difficult process and we continue to collaborate with procurement colleagues in the sector on this. Progress has been difficult during the pandemic but we were able to successfully run a project, as part of an apprenticeship training programme, to map the supply chains of some of our catering suppliers.

The ongoing development of our procurement approach is demonstrated by the University being ranked number one in the world in The Times Higher Education Impact Rankings 2021 which assess progress against the SDGs. Within the evaluation we scored first out of 503 submissions within *SDG* *12: Responsible Consumption and Production.* This reflects, in part, our commitment to responsible procurement including supply chain transparency.

## Staff Training and Promoting Awareness of the Slavery and Human Trafficking

Raising awareness of modern slavery amongst staff is important and is an ongoing exercise given continual staff turnover in an organisation of our size and diversity. This includes a regular refresh of material such as that incorporated into our annual risk and compliance training programme. More general training is available through our staff sustainability engagement programme: 10,000 Actions. This includes a module on Responsible Procurement with material on modern slavery. It also links to the CPO web-pages which contain information and external links that allow colleagues to explore the subject in more detail. Analysis of internal hits on these web-pages confirm they are amongst the most visited on the CPO website.

Specialist training is undertaken by certain staff. For example our CPO team are all professionally qualified and maintain their certification by completing The Chartered Institute of Purchasing and Supply – Ethical Procurement and Supply course annually. Additional training is available for these staff to widen skills and keep their knowledge current. We are keen to provide relevant training for other professional staff, for example within estates, when the campus re-opens fully over the coming year.

Supplier training events have been paused during the pandemic. We have previously held events for our estates suppliers in 2018 and a joint event with TUCO for our nationally contracted catering suppliers in 2019. These sessions raise awareness of slavery and trafficking within supply chains, and encourage buyers and suppliers to work together to encourage transparency and to end unacceptable practices. Previous sessions have been well attended and we are keen to restart them, in high risk category areas, as soon as is practicable.

We continue to engage widely to share best practice and remain up-to-date with slavery and human trafficking within supply chains. Contact has been maintained virtually with all of our networks and our Head of Procurement has remained in post as the chair of the HE Sector Responsible Procurement Group whose remit includes modern slavery.

Also during the year we have remained a member of several networks outside the sector. Importantly we belong to two Manchester based groups: SFA and the Greater Manchester Modern Slavery Business Network. Through these groups we have access to current business intelligence as well as resources to help manage supply chains more effectively. Meetings of the GM network allow us to share ideas and provide opportunities to explore issues and experiences to tackle trafficking and its impacts within our city.

Over the coming year we will continue to develop our practices and procedures with regard to slavery and trafficking to make sure that they meet our needs and evolve appropriately to changes in the business environment.

**Chair of the Board of Governors**