

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 2022. This is our seventh statement under the Act and provides an overview of our risks and actions in this area.

The Covid-19 pandemic has continued to impact on our operations during the year and whilst our campus operations have recommenced the University has moved to a hybrid working model. These changes, alongside dislocations within global supply chains, have impacted our spending patterns and risk profile, in respect of modern slavery, over the year.

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. The University was founded as a civic organisation, established for public benefit, and our mission is to “advance education, knowledge and wisdom for the good of society”. Our commitment to social responsibility is unique in UK higher education where it sits as one of three core goals alongside our more traditional commitments to research and teaching.

Whilst the University’s foundations go back 200 years we came into existence as an independent corporation through a royal charter on 1 October 2004. The University also has charitable status under the Charities Act 2011. Responsibility for monitoring compliance with charity law obligations rests with the Office for Students and the University is aware of its responsibilities as a charity to act for the public benefit. Our governance structure reflects a commitment to conduct our affairs in a responsible and transparent manner and in line with the reports of the Committee on Standards in Public Life. Full details can be found on our website: www.manchester.ac.uk/discover/governance

Our main campus is located in Manchester, but our research and collaborative activities take place across the world. In 2022 we had over 40,000 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 approximately 7,000 academic and 5,000 support staff and an annual income in excess of £1 billion.

We are structured around three academic faculties comprised of individual schools: Biology, Medicine and Health (with three Schools), Humanities (with four Schools) and Science and Engineering (with two Schools). In addition we have twenty three interdisciplinary research institutes and four university-wide research platforms. A Professional Services structure provides administrative support. Our organisation is explained on our web-pages: www.manchester.ac.uk/discover/structure

More information about us and our activities, including a link to our annual Modern Slavery Statements, are available at www.manchester.ac.uk

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

1. People; our diverse population of staff and students. Our student body consists of a large number of young adults. Most of our undergraduate students come from the UK but we also have a substantial international student population. The welfare of our staff, students and visitors is our highest priority.
2. Supply chains: we have a large 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 wide range of works, goods and services. Over the year we transacted with over 7,000 suppliers and had an invoiced spend of approximately £520 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 commitments to transparency and operating in a responsible manner. As an institution we promote 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 established risk management structures including our welfare and safeguarding procedures;
- Working to understand, our diverse supply base and the wider supply chain on which we rely, through a formal process of supplier engagement;
- Focussing our limited resources through an informed risk based approach to target actions within our supply chains;
- Being transparent and honest about our approach: promoting awareness, sharing our experiences, collaborating within the HE sector, and beyond, and through training colleagues, students, suppliers, and others.

The University has a clear chain of accountability for modern slavery; overall responsibility rests with our Board of Governors whilst day-to-day activity is undertaken by the University's Professional Services function.

Review and oversight of this area is integrated within the portfolio of the Director of Risk and Compliance. Much of our focus to date has been on our supply chains, and maintaining essential activities during the pandemic, however we recognise that as we enter a new normal mode of operating we need to update our approach to ensure fuller coverage of the University's risks in this area. This will include a refreshed co-ordinating group drawn from senior colleagues within a number of Professional Services Directorates including: Risk and Compliance, Finance (Central Procurement Office), Human Resources, Legal Affairs, Student Experience, and Social Responsibility.

The University expects staff to follow 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 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 led by a robust policy: <https://documents.manchester.ac.uk/display.aspx?DocID=62309> which is accompanied by set procedures for promoting the safety of children and adults within the University community;
- We review our standard terms and conditions of business annually. These require compliance with the Modern Slavery Act 2015 and we also reinforce the expectation that our suppliers will work with us in tackling modern slavery throughout our shared supply chains;
- We keep under review our procurement documentation, and processes, to ensure that they reflect best practice and support our objectives in this area. Our requirements are set out clearly in all of our documentation including:
 - Our Procurement Policy which highlights our commitment to responsible procurement. This sets the requirement around legal compliance, and also that our procurement activity support the UN Sustainable Development Goals (SDGs). This includes *SDG 8: Decent Work and Economic Growth*, which is consistent with our zero tolerance of forced labour, modern slavery and human trafficking by encouraging the protection of labour rights and working practices across supply chains.
 - Our suppliers are required to abide by our Supply Chain Code of Conduct, a common document in use across the HE sector. This also references the SDGs and is clear about our requirements around not using forced, involuntary or underage labour and that all workers be treated equally and fairly. Collaborating through a sector wide approach reinforces the expectation of positive behaviours with regard to the social, ethical, economic and environmental practices to be demonstrated by our suppliers and their associated supply chains.

We are committed to transparency as a means of driving up standards and highlighting human rights issues within supply chains. We expect our suppliers, and their supply chains, to be similarly open about their operations. In 2017 we signed up to Transparency in the Supply Chain (TISC) – the world’s largest open data repository of Modern Slavery and Human Trafficking Statements – and became a Public Partner in 2018. 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 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 the charity Slave Free Alliance (SFA). We joined SFA in 2019 as their first HE member and renewed this membership in 2022. Our partnership with them gives us independent assurance on our progress in this area, as well as access to information and shared experience. In addition SFA provides actual help and support for rescued victims of slavery and trafficking.

Our Approach to Understanding and Managing Risk of Modern Slavery

This section covers our practice in respect understanding our risks around modern slavery, our due diligence processes, evaluation of risks in our supply chains and our supplier engagement programme to manage these risks. Additional detail on how this works is included in the schedule attached to this statement.

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 our modern slavery activities within our wider risk management framework and covering specific risks through existing safeguarding structures. This is an evolving area with a continuing focus on:

- Understanding the risk profile around modern slavery and people trafficking;
- Ensuring Senior staff are appraised of modern slavery issues as part of the annual programme of risk and compliance training;
- Developing appropriate training for new, and existing, staff on the risks that may be faced within our working environment;
- 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;
- Integrating activity to ensure adequate publicity and information is available across our various communication platforms to highlight modern slavery risks;
- Linking activities in this area into existing initiatives with our Student Union in order 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.

Our supply chains offer a more difficult challenge but we been working for several years to understand our suppliers and their supply chain risks. Given the size of our supply base 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 fact strengthens our commitment to work with our tier one suppliers to take steps to prevent such abuses from happening.

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 2021-22 we had 7,106 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.

As an organisation our expectations from our supply chain are made clear within our tender documentation, our on-line assessment tool and our ongoing engagement with our suppliers. Additional background on what is important to us, and why, is provided on our web-pages. These also contain supplementary information to highlight our commitment to responsible procurement and to improving working conditions within our mutual supply chains.

We have in place appropriate due diligence processes to vet and manage our suppliers and their products. First is to ensure that we contract with suitable and responsible suppliers. 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. Contracted 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) since 2019.
- We affiliated with Electronics Watch (EW) as a member of our regional purchasing consortium (NWUPC) in 2019.
- We signed-up to the Gangmasters and Labour Abuse Authority (GLAA) 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.

The effectiveness of contracts and supplier monitoring is undertaken in two ways: (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. A number of contract letting organisations include physical site visits, as part of their contract management process, for companies based in the UK. These include a visual review of premises and observed working practice by staff alert for possible signs of slavery. At the date of writing 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 manage 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.

Our 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 means of focussing resource and effort. Priority is given to categories that are rated as high risk using this scoring method. Further detail on what this looks like for our supply base is demonstrated on the attached schedule. Working in this way means we can target our limited resources with our tier one suppliers expanding our understanding and promoting best practice. We can cascade this to lower tiers of our supply chain, such as with our construction partners, where we have imposed obligations around the appointment of sub-contractors on 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.

Promoting transparency, and understanding our suppliers and their supply chains, is central to our approach. We do this through the use of our on-line assessment tool to engage with our suppliers to appraise their approach across a range of economic, social and environmental issues. The content of the system is refreshed on a regular basis to allow us to keep up to date with current supply chain practice. Each and every supplier is encouraged to share with us details of their business activities, including slavery and human trafficking issues, impacting 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 2,300 suppliers have completed this information. A snapshot of this data in respect of modern slavery practice is provided on the attached schedule.

Information from suppliers enables us to undertake limited supply chain mapping, particularly in high risk areas, beyond our first tier suppliers. This is a difficult process but following a successful project, as part of an apprenticeship training programme, mapping the supply chains of some of our contracted catering suppliers, we are looking forward to extending this to other commodity areas over the coming year.

Staff Training and Promoting Awareness of the Slavery and Human Trafficking

Raising awareness of modern slavery amongst our staff is important. This is an ongoing exercise given the continual staff turnover in an organisation of our size and diversity. Our Directorate of Risk and Compliance keep under review the material included in our annual risk and compliance training programme. More general training is available through our staff sustainability engagement programme: 50,000 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 hits on these web-pages confirm they are amongst the most visited on the CPO website and that visitors are spending longer than average reviewing the information they contain.

Specialist training is undertaken by appropriate staff. 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. Supplementary training is available for these staff to ensure that their skills remain current. We are keen to explore options to make targeted training more accessible for other professional staff within the University.

We continue to discuss the issue across our range of sector partners in order to share best practice and remain up-to-date with developments 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.

We have remained an active member of several networks outside the sector. As an important Greater Manchester anchor institution we belong to two Manchester based groups: SFA and the Greater Manchester Modern Slavery Business Network. Through these groups we can access current business intelligence as well as resources to help manage supply chains more effectively. Meetings of the GM



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network allow us to share ideas and provide opportunities to explore issues and experiences to tackle trafficking and its impacts within our city.

As we continue, over the coming year, to embed our hybrid working model we will revisit our approach to the risks of modern slavery within our business and supply chains. We will undertake a risk based review of our practice in this area which we anticipate will lead to a new action plan to ensure our policies and procedures are fit for purpose and evolve in line with best practice.

Nancy Rothwell, President and Vice-Chancellor

Approved by Board of Governors, 24 November 2022

Modern Slavery Act Statement August 2022 Supporting Schedule

1. Understanding Our Suppliers

We manage our suppliers through a category approach using a standard HE taxonomy that utilizes 23 Level 1 codes further subdivided into 461 detailed sub-level codes. Suppliers are categorized based on their majority supply to us and we understand the risk of slavery in each area by applying the UN Marrakesh risk profile allocated to each category. This has been developed at a sector level by a group from the Higher Education Procurement Association (HEPA).

With regard to modern slavery our supplier risk profile is categorized as follows:

40% of our Suppliers are in a High Risk Category	Sub-Level Codes	Number of Suppliers
Catering	21	134
Estates & Buildings	27	389
Facilities & Operations	17	0
Furniture, Furnishings & Textiles	20	108
Health & Safety & Security	14	106
IT & Computer	23	402
Janitorial & Domestic	13	59
Laboratory	102	1,296
Printing	11	100
Workshop, Maintenance & Engineering	19	280

11% of our Suppliers are in a Medium Risk Category	Sub-Level Codes	Number of Suppliers
Agricultural & Horticultural	16	61
Audio-Visual & Multimedia	18	284
Medical	10	188
Museums & Art	9	0
Sports & Recreation	9	0
Telecommunications	15	76
Travel & Transport	20	162

49% of our Suppliers are in a Low Risk Category	Sub-Level Codes	Number of Suppliers
Library & Publications	21	235
Other Spend (e.g. rent, rates, HMG, NHS, Local Government etc.)	17	1,589
Professional & Bought-in Services*	25	1,563
Stationery & Office Supplies	10	15
Utilities	10	33
Vehicles & Fleet Management	14	26

*This category includes Temporary Staff Suppliers which are considered High Risk

In addition we also assess geographic risk based on the likelihood of use of forced and/or child labour of our suppliers using a country and product risk identified by the [Anti-Slavery Organization](#)

We use the data our suppliers provide and their geographical allocation is based on the head office of the supplying organization.

Higher Risk Areas (only 2.76% of our suppliers fall into this category)	Number of Suppliers	% Total of Suppliers
Africa	88	1.24
Asia	8	0.11
Central America	1	0.01
East Asia	63	0.89
South America	9	0.13
South Asia	28	0.39

Lower Risk Areas (97.23% of our suppliers fall into this category)	Number of Suppliers	% Total of Suppliers
Australasia	18	0.25
Europe (EU and non-EU)	518	7.29
Middle East	9	0.13
North America	386	5.43
United Kingdom	5,978	84.13

The vast majority of our business is with suppliers who are registered in, and conduct their business from, the UK. Whilst this does not remove the risk of slavery, or trafficking, from with the supply chains of these organisations it does mean that we are able to engage with them more easily.

We have carried out an analysis of the actual purchases we have made from suppliers with a registered office in the countries listed as being higher risk. This confirms that we did not purchase products identified from these suppliers where there is an increased risk of use of forced and/or child labour in their production.

2. Engaging with Our Suppliers

All of our suppliers are asked to complete our on-line assessment tool. This provides an opportunity for our Tier 1 suppliers to tell us about their business and the impacts (positive and negative) across the range of their operations. This includes the work they do with their supply chains and a snapshot of their actions relating to modern slavery are provided below.

To date over 2,300 of our suppliers have engaged with the tool:

Data from our Suppliers	2021	2022
Suppliers who have engaged with the tool but not fully completed and action plan	2,117	2,303
Suppliers who have created action plans to tell us about their activities	1,764	1,917

The number of suppliers actively engaging with the on-line system has continued to grow and, as a result of ongoing interaction with the Central procurement Office, we have seen the number fully completing a plan increase against last year.

Awareness of modern slavery is increasing across our supply base:

Data from our Suppliers	2021	2022
Suppliers are aware of the Modern Slavery Act	94%	95%
Suppliers feel modern slavery is an issue for them	10%	12%

One of our suppliers told us:

'We are committed to ensuring that there are no issues with regards to labour and ethics, occupational health and safety and environmental issues within our supply chain or in any part or at any level of our business. We will not knowingly use partners, sub-contractors, suppliers or agents who disregard these laws and regulations.'

It is encouraging to see that our suppliers are more aware of slavery and trafficking and that an increased number are willing to accept that this may be something that affects their business.

Some 43% of the suppliers with which we have engaged have published their modern slavery statement though 57% have not. Of these 46% have told us they are not required to publish a statement either because they are based outside of the UK, or they are UK SMEs who fall below the turnover requirements in the Modern Slavery Act 2015. However, for this group of suppliers we have developed guidance, in collaboration with some of our academic colleagues, to help them respond appropriately to the need for supply chain transparency within their operations: [Modern Slavery and Supply Chain Transparency](#)

For those completing action plans suppliers have provided us with additional detail on what they are doing to tackle the problem of modern slavery within their business and to provide us with further details on these initiatives:

Data from our Suppliers	In Progress	In Progress	Completed	Completed	Not Started	Not Started	With Evidence	With Evidence
	2021	2022	2021	2022	2021	2022	2021	2022
Engage with your suppliers on MS	50	59	31	42	115	141	39	47
Publish your MS Statement	31	34	49	71	120	153	39	52
Provide staff with training on MS	31	37	31	43	130	161	34	40
Work to remove MS from supply chain	52	55	43	63	103	134	47	59

One of our suppliers told us:

'Our suppliers are subjected to robust selection processes and criteria including verification against government denied party lists. Our standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations.'

There is a year-on-year improvement in the number and quality of the supplier submissions in this category. Increasing numbers of our suppliers are engaging with their suppliers, training staff and taking action to remove modern slavery from their supply chains. These represent our Tier 2, and beyond, suppliers so this is important for us. The additional supporting evidence suppliers are providing helps us to identify good practice and provides an opportunity to share this with suppliers that have started plans but have not completed them.

Suppliers also let us know about their businesses in terms of sourcing products and their in-house resources to manage their business activities:

Data from our Suppliers	2021	2022
Suppliers with a head office outside the UK	13%	19%
Suppliers who source >25% of their goods/services outside Europe	22%	22%
Suppliers with a Corporate Social Responsibility (CSR) lead in their business	31%	31%

One of our suppliers told us:

'In addition, all individual companies have their own local Compliance Officers, who are responsible for implementing training measures on-site and resolving any local compliance violations. The Compliance Officers are the contact persons on compliance topics for employees and managers alike. As a rule, we does not enter into any business relationship with any suppliers who violate human rights.'

Possibly as a result of BREXIT and the pandemic we have seen an increase in suppliers with registered offices outside the UK. This may indicate that those suppliers also fall outside the scope of the UKs Modern Slavery Act. The numbers of suppliers sourcing a significant amount of their goods and services outside Europe has remained the same as last year. Only 4% of respondents were unable to answer this question giving us confidence that our suppliers know their supply chains. Also staying the same as 2021 is the percentage of suppliers with a CSR lead. This is important as suppliers with available resource in this area recognise the importance of social issues in their business and typically have capacity to ensure they take proper custody of their supply chains.

We recognise that some areas of our supply chain represent a higher risk in terms of modern slavery and the highest risk categories and their engagement are provided below:

Data from our Suppliers	Estates & Buildings	Estates & Buildings	IT & Computing	IT & Computing	Catering	Catering
	2021	2022	2021	2022	2021	2022
Number of suppliers registered by group	134	142	148	167	80	84
Recognising MS is an issue for their business	16%	19%	15%	15%	14%	16%

One of our suppliers told us:

'We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.'

A higher percentage of our suppliers (15-19%) in these categories recognise that slavery is an issue for them against the total number of our suppliers (12%). This is still low and we have targeted two of these categories previously for supplier training sessions: estates in 2018 and catering in 2019. We will need to revisit this and look at what can be done with both suppliers, and internal contract owners, to provide more re-assurance around high risk spend categories.