

**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 31July 2023. This is our eighth statement under the Act and provides an overview of our risks and actions in this area.

Our report is structured in line with the Home Office’s [statutory guidance](https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide) which recommends we cover six key areas in our statement.

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

**1. 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. We were 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](https://www.manchester.ac.uk/discover/social-responsibility/) is unique in UK higher education where it sits as one of three core goals alongside our commitments to research and teaching.

Our foundations go back 200 years but the modern University was created 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](https://www.manchester.ac.uk/discover/governance/) 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.

Our main campus is located in Manchester, but our research and collaborative activities take place across the world. In 2023 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 a number of interdisciplinary research institutes and four embedded Cultural Institutions. A Professional Services structure provides administrative support. Our organisation is explained on our [web-pages](https://www.manchester.ac.uk/) along with our [Annual Modern Slavery Statements](https://www.manchester.ac.uk/modern-slavery-statement/).

Our activities can be divided into two areas which create both opportunities and risks in respect of modern slavery:

1. Our operations which give raise to our two main risks:
2. 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.
3. 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 7,300 suppliers and had an invoiced spend of approximately over £520 million. As an organisation we are committed to spend our money in a responsible manner.
4. Our teaching and learning, research and social responsibility activities which offer opportunities to understand developments in modern slavery locally, nationally and internationally and to share this knowledge with our students, the public and policy makers.

**2. Our Policies and Processes relating to Slavery and Trafficking**

Our modern slavery approach is consistent with our commitments to social responsibility, equality, diversity and inclusion and operating in a responsible and transparent manner. We expect staff to follow the seven principles of behaviour on Standards in Public Life (‘Nolan Principles’) and require 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 have 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.

We continually review our approach in this area and following an internal audit review, responsibility for our approach to modern slavery now falls under the remit of a Modern Slavery Co-ordination and Oversight Group (MSCOG) chaired by the Director of Social Responsibility. This allows a more holistic approach to be taken across our range of activities, integrating the work we undertake on our supply chains with our academic and outreach activities. MSCOG is comprised of senior academic and professional services staff and the remit of the group is to ‘provide oversight and coordination to the full range of areas across the University relevant to combatting modern slavery’.

We have a range of policies and procedures to support our zero tolerance approach to modern slavery and human trafficking. These include:

* an [Anti-Slavery and Human Trafficking Policy](https://documents.manchester.ac.uk/display.aspx?DocID=32018) in place since 2016;
* a [Safeguarding Policy](https://documents.manchester.ac.uk/display.aspx?DocID=62309) supported by effective procedures to promote the safety of children and adults within the University community;
* [Standard terms and conditions of business](https://documents.manchester.ac.uk/display.aspx?DocID=15179) which are reviewed annually. These require compliance with the Modern Slavery Act 2015 where we reinforce the expectation that our suppliers will work with us in tackling modern slavery throughout our shared supply chains;
* Procurement documentation, and processes, which are constantly reviewed to ensure that they reflect best practice and support our objectives in this area. These include:
	+ Our [Procurement Policy](https://documents.manchester.ac.uk/protected/display.aspx?DocID=11843) which sets out legal requirements and more proactive approach to responsible procurement. This includes supporting the UN Sustainable Development Goals (SDGs), notably *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](https://documents.manchester.ac.uk/display.aspx?DocID=48681), a 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. Our [Annual Modern Slavery and Human Trafficking Statements](https://www.staffnet.manchester.ac.uk/procurement/responsible-procurement/modern-slavery/) have always been made available on our webpages. In addition they are accessible through the [tiscreport portal](https://tiscreport.org/) (since 2017) and via the [UK Home Office Modern Slavery Statement Registry](https://modern-slavery-statement-registry.service.gov.uk/) (since 2021).

**3. Due Diligence Processes**

Our supply chains efforts are focussed on our Tier 1 suppliers which we rely on most of all to deliver our business objectives. Our due diligence is based on selecting appropriate suppliers and the use of relevant external standards.

Firstly, our aim is to enter into contracts with suitable and responsible suppliers.

* The majority 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.
* Our contracted suppliers are subject to a formal selection process to vet them and their products 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 an assessment of, amongst other things, their supply chain practices and adherence to modern slavery legislation.

Secondly, we make use of a number of external standards, and agencies, to provide assurance on labour practices for applicable products and processes. 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.

Of relevance to high-risk purchasing categories and concerns around slavery and trafficking are the following:

* We have maintained [Fairtrade](https://www.fairtrade.org.uk/) status since 2005.
* We have maintained accreditation with the [Living Wage Foundation](https://www.livingwage.org.uk/)(LWF) since 2019.
* We affiliated with [Electronics Watch](https://electronicswatch.org/en) (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](https://www.gla.gov.uk/media/4666/the-construction-protocol-002.pdf) in 2019.
* We became the first HE member of the social enterprise [Slave Free Alliance](https://www.slavefreealliance.org/) (SFA), owned by the charity Hope for Justice, in 2019 and renewed this membership in 2022. Our partnership with them gives us independent challenge on our progress in this area, as well as access to information and shared experience. Through our membership of SFA we know we are also helping to fund practical, victim-centred support if a case of modern slavery is suspected or disclosed.

Contracting with responsible suppliers means that we can work with them, and their supply chains, to monitor issues and continue to raise awareness of our zero tolerance approach to modern slavery.

As part of our ongoing due diligence work we will be reviewing our practice against the UK Government’s April 2023 guidance on [Tackling Modern Slavery in Government Supply Chains (PPN 02/03).](https://www.gov.uk/government/publications/ppn-0223-tackling-modern-slavery-in-government-supply-chains/ppn-0223-tackling-modern-slavery-in-government-supply-chains-guidance-html)

**4. Risk Assessment and Management**

As outlined above the two main operational risks areas for the University, in terms of slavery and trafficking, relate to people and supply chains. We also challenge modern slavery through our role as a university in research, teaching and social responsibility.

1. **Operational risk assessment and management**

On people, we manage risk by integrating our modern slavery activities within our broader risk management framework which covers specific risks such as safeguarding. Examples of our approach include:

* 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 Students’ Union in order to raise the profile of the issue within the student body and work together to make our campus free of modern slavery and trafficking.

Given the size and diversity, of the products and services we buy we take a proportional response to our risk assessment. We work to understand our suppliers and their supply chain risks, recognising that there will always be an underlying risk in such a large and complex organisation that some form of human exploitation may be embedded somewhere within parts of our extended supply chains. This awareness strengthens our commitment to work with most significant tier one suppliers to minimise this likelihood.

Our size and diversity of suppliers is evident through 7,306 entities being active on our system during 2022/23. Furthermore, in a typical financial year we will add, and retire, around 1,200 suppliers.

We use a risk management approach to classify our suppliers as part of our category management approach. This means we are able to understand and review risks within specific categories of spend. Further detail is provided in **Appendix A** and this approach allows us to understand and target high-risk areas. We focus our resources on these tier one suppliers, challenging them and promoting best practice. We are also able to cascade this approach beyond tier one, for example on large construction projects, where we have imposed obligations around the appointment of sub-contractors.

Supply chain risks are managed throughout the procurement process, with expectations about modern slavery being made clear within our tender documentation, our on-line assessment tool and our ongoing supplier engagement. The effectiveness of contracts and supplier monitoring is undertaken in two ways: (a) ongoing contract management processes, and (b) ongoing supplier management practices. 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. These include a visual review of premises and observed working practice by staff alert for possible signs of slavery. These provide physical reassurance that actual working practices continue to meet our expectations.

Our local supplier management processes supplement these, and we actively manage our contracted suppliers, based on the risk evaluation noted above, through local contract management and an active supplier engagement process.

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 has been fully refreshed this year to allow us to keep up to date with current supply chain practice. 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 2,000 suppliers have completed this information. A snapshot of this data in respect of modern slavery practice is provided in **Appendix A**.

**b. Research, Teaching and Social Responsibility contributions**

As a site of research, teaching and social responsibility, we also combat risk in the wider society, creating opportunities to challenge modern slavery and human trafficking. This comes from using our core goals committing us to: i) research: understand more about the phenomenon of modern slavery and human trafficking ii) teaching: through our education function we share the latest knowledge about modern slavery and human trafficking to inform tomorrow’s professionals, citizens and voters through our taught programmes; and iii) social responsibility: using our knowledge to proactively engage with and influence wider practice, policy and awareness of modern slavery.

1. **Research:** in the area of modern slavery we have [11 active members](https://research.manchester.ac.uk/en/searchAll/advanced/?searchByRadioGroup=PartOfNameOrTitle&searchBy=PartOfNameOrTitle&allThese=modern+slavery+&exactPhrase=&or=&minus=&family=persons&doSearch=Search&slowScroll=true) of staff publishing work associated with the term modern slavery and [59 research outputs](https://research.manchester.ac.uk/en/searchAll/advanced/?searchByRadioGroup=PartOfNameOrTitle&searchBy=PartOfNameOrTitle&allThese=%22modern+slavery%22+&exactPhrase=&or=&minus=&family=publications&doSearch=Search&slowScroll=true&ordering=publicationYearThenTitle&descending=true) related to this concept over the five year period 2019/20/21/22/23. A summary of research projects is included in **Appendix B.** One example is the work of Professor of Criminology, Rose Broad, who has [26 research outputs](https://research.manchester.ac.uk/en/persons/rosemary.broad/publications/) connected to modern slavery and human trafficking. Her work Broad, R., Lord, N., & Duncan, C. (2020). [The Financial Aspects of Human Trafficking: A Financial Assessment Framework](https://research.manchester.ac.uk/en/publications/the-financial-aspects-of-human-trafficking-a-financial-assessment) has presented a framework for analysing, assessing and systematising the varying financial aspects of human trafficking from 378 human trafficking cases. This work demonstrated the feasibility of analysing the before, during and after financial components of human trafficking while recognising obstacles to uncovering their entirety; it reaffirmed that while most known trafficking cases are not substantially profitable in financial terms, they involve varied operational and infrastructural financial costs; and it argued that although financial institutions, such as banks, can be central to the dialogue with enforcement, the ability of many trafficking enterprises to operate outside formal financial institutions calls for a consideration of the interfaces and overlaps of the finances of trafficking within and outside the banking system. This work has been downloaded 449 times to date.
2. **Teaching:** we teach about modern slavery on a number of programmes. Examples include: a Year 3 optional unit on [Serious and Organised Crime](https://www.manchester.ac.uk/study/undergraduate/courses/2023/07052/ba-criminology/course-details/CRIM30811#course-unit-details:~:text=(6)%20Modern%20slavery%20and%20the%20illegal%20movement%20of%20people%3B%20(7)) on our BA Criminology programme which examines the role of modern slavery and the illegal movement of people; a range of modules on modern slavery in the garment sector as part of our [BSc Fashion Marketing](https://livemanchesterac.sharepoint.com/sites/OfficeforSocialResponsibility/Shared%20Documents/Function%204%20Responsible%20Operations/Modern%20Slavery/Modern%20Slavery%20Coordination%20%26%20Oversight%20Group%20%28MSCOG%29/MATS22601%20Operations%20Management%20Year%202%20%20MATS22102%20Fashion%20Management%20Year%203%20%20MATS34502%20Business%20Ethics%2C%20Sustainability%20%26%20CSR%20Year%203); and a unit on [Sustainable Finance and Accounting](https://www.alliancembs.manchester.ac.uk/study/masters/msc-accounting/course-details/BMAN74551#course-unit-details) where modern slavery is considered as part of broader Environmental, Social and Governance (ESG) issues as part of our MSc in Accounting.
3. **Social Responsibility:** staff across the University are involved in a wide range of practical social responsibility and public engagement roles. Our Professor of Public History David Olusoga has led a [BBC Radio 4 appeal](https://www.unseenuk.org/unseens-bbc-radio-4-appeal/) to raise funds for the UK Modern Slavery and Exploitation Helpline. Other examples include the work of Ser-Huang Poon in our Alliance Manchester Business School through a programme with the NGO [Stop the Traffik](https://www.stopthetraffik.org/what-we-do/traffik-analysis-hub/) to disrupt human trafficking; membership of public and statutory bodies such as His Majesty’s Prison and Probation Service Modern Day Slavery, His Majesty’s Prison and Probation Service Anti-Criminal Exploitation Network, Home Office Modern Slavery Unit academic roundtable and the Greater Manchester Anti-Trafficking NGO Forum and Anti-Trafficking Business Forum (all by our Professor of Criminology Rose Broad); and working with the Greater Manchester Combined Authority (GMCA) and technology development company Trilateral Research to develop relationships with organisations across the private, public and civil society sectors, and support them to record information related to modern slavery, human trafficking and exploitation.

**5. Training on Slavery and Human Trafficking**

Raising awareness of modern slavery through training is an ongoing activity due to the size of our workforce and the importance of the issue itself. 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 Central Procurement Office (CPO) web-pages, which contain information and external links that allow colleagues to explore the subject in more detail.

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 will be reviewing our training as part of our 2023/24 objectives.

**6. KPIs to Measure the Effectiveness of Steps Taken**

We monitor the impact and effectiveness of our work using a number of key performance indicators. For example, in 2022/23 we know that:

* 40.3% of our suppliers were in high risk areas, 10.5% were in the medium category and 49.2% in low risk areas;
* 2004 suppliers used our supplier engagement tool, with 1,693 of these completing a sustainability action plan outlining how they were combatting modern slavery;
* 64% of our suppliers have published their own modern slavery statement; the remaining number are unlikely to need to because of their different status (under the threshold, outside UK etc);
* 96% of our businesses are aware of the Modern Slavery Act;
* 16% of businesses felt modern slavery was an issue for them;
* 21% of our suppliers have a head office outside the UK where there is a higher risk.

During 2023/24 the University’s Modern Slavery Co-ordination and Oversight Group (MSCOG) will be prioritising work streams that will:

* Develop a new policy on modern slavery;
* Review and suggest new KPIs;
* Review our approach to training and awareness;
* Enhance our public engagement role on modern slavery.

**Nancy Rothwell, President and Vice-Chancellor**

**Approved by Board of Governors on 23 November 2023**

**Appendix A: Further information in support of our 2023 Modern Slavery Statement**

**This Appendix provides further and more detailed information in support of our Modern Slavery statement.**

**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 level 2 codes. Suppliers are categorised based on their majority supply to us. The slavery risk is understood by applying a robust and widely used risk profile per category which 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:

40.3% of our suppliers are in high risk category areas

**High Risk**

|  |  |  |  |
| --- | --- | --- | --- |
| **A summary of the 7,306 active suppliers in 2022-23 is provided below:** |  | **Level 2 codes in each risk area** | **Suppliers in each area** |
|  |  |  |  |
| F - Furniture, Furnishings & Textiles |  | 20 | 125 |
| H - Janitorial & Domestic |  | 13 | 61 |
| M - Workshop, Engineering & Maintenance |  | 19 | 295 |
| W - Estates & Buildings |  | 27 | 411 |
| K - IT & Computer |  | 23 | 436 |
| Y - Facilities Operations |  | 17 | 2 |
| C - Catering |  | 21 | 139 |
| L - Laboratory |  | 102 | 1263 |
| P - Printing |  | 11 | 108 |
| U - Health, Safety & Security |  | 14 | 102 |

10.5% of our suppliers are in medium risk category areas

**Medium Risk**

|  |  |  |  |
| --- | --- | --- | --- |
| A - Audio-Visual & Multimedia |  | 18 | 291 |
| D - Medical |  | 10 | 138 |
| Q - Telecommunications |  | 15 | 73 |
| G - Sports & Recreation |  | 9 | 0 |
| E - Agricultural & Horticultural |  | 16 | 49 |
| N - Museums & Art |  | 9 | 0 |
| T - Travel & Transport |  | 20 | 217 |

49.2% of our suppliers are in low risk category areas

**Low Risk**

|  |  |  |  |
| --- | --- | --- | --- |
| B - Library & Publications |  | 21 | 284 |
| J - Utilities |  | 10 | 30 |
| R - Professional & Bought in Services\* |  | 25 | 1632 |
| S - Stationary & Office Supplies |  | 10 | 22 |
| V - Vehicles & Fleet Management |  | 14 | 21 |
| X - Other (Rent, Rates, etc) |  | 17 | 1607 |

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

In addition we 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](https://childhub.org/sites/default/files/anti_slavery_poster-final.pdf).

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

| **Geographic Risk** | **Area** | **Number of Suppliers by Registered Address** | **% Of** **Total** **Suppliers** |
| --- | --- | --- | --- |
|  | AfricaAsiaCentral America East AsiaSouth AmericaSouth Asia | 1175154735 | 1.60.10.00.70.10.5 |
|  |  |  |  |
|  | AustralasiaEuropeMiddle EastNorth AmericaUK | 24572103596122 | 0.37.80.14.183.8 |

**High Risk**

**Lower Risk**

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 the supply chains of these organisations, it does mean 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 any products identified from these suppliers where there is an increased risk of use of forced and/or child labour in their production.

**2. Engaging our Suppliers**

|  |  |  |
| --- | --- | --- |
| **Our Supplier Tool** | **2022** | **2023** |
| Suppliers have engagedwith the Tool | **2,303** | **2,004** |
| Suppliers have completedsustainability action plans | **1,917** | **1,693** |

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. During the year the database has been cleansed and the information we capture has been refined so year-on-year comparisons of the data is somewhat misleading but the quality of information we can now access has improved.

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.

Awareness of modern slavery is increasing across our supply base:

|  |  |  |
| --- | --- | --- |
| **Modern Slavery Data** | **2022** | **2023** |
| Businesses are aware of the Modern Slavery Act | **95%** | **96%** |
| Businesses felt Modern Slavery is an issue for them | **12%** | **16%** |

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 64% of the suppliers with which we have engaged have published their modern slavery statement though 36% have not. Of the former, 34% 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](https://documents.manchester.ac.uk/display.aspx?DocID=37677).

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:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Supplier Action Plans** | **In Process** | **Completed** | **Not Started** | **With Evidence** |
| **2022** | **2023** | **2022** | **2023** | **2022** | **2023** | **2022** | **2023** |
| Engage with your suppliers on Modern Slavery | **59** | **69** | **42** | **53** | **141** | **161** | **47** | **56** |
| Publish your 'Modern Slavery Act Transparency Statement' | **34** | **42** | **71** | **99** | **153** | **156** | **52** | **71** |
| Provide training for staff on Modern Slavery | **37** | **51** | **43** | **59** | **161** | **168** | **40** | **52** |
| Develop a robust approach to removing Modern Slavery from supply chains | **55** | **58** | **63** | **80** | **134** | **149** | **59** | **72** |

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:

|  |  |  |
| --- | --- | --- |
| **Our Supplier Tool** | **2022** | **2023** |
| Suppliers have a head office outside the UK | **19%** | **21%** |
| Suppliers have >25% of goods / services they provide sourced outside of Europe | **22%** | **23%** |
| Suppliers have a CSR or lead on sustainability in their business | **31%** | **32%** |

We are seeing a diversification of our supplier base with an increased number with registered offices outside the UK which, in some cases, means they fall outside the scope of the UK’s Modern Slavery Act. This trend is mirrored in the regions from which suppliers source their goods and services. However, the growing adoption of similar legislation in other countries is something which is encouraging and may offer alternative assurances for purchasing organisations. The slight increase in organisations with a CSR lead within their business reverses a trend seen over previous years. This is good news for buyers 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.

Recognising that some areas of our supply chain represent a higher risk in terms of modern slavery we focus efforts on these categories and their engagement are provided below:

|  |  |  |  |
| --- | --- | --- | --- |
| **Highest Risk Areas** | **Estates & Buildings** | **IT & Computer** | **Catering** |
| **2022** | **2023** | **2022** | **2023** | **2022** | **2023** |
| Number of registered suppliersin each group | **142** | **123** | **167** | **169** | **84** | **71** |
| Recognise Modern Slavery is an issue for their business | **19%** | **22%** | **15%** | **12%** | **16%** | **15%** |

It is noticeable that only in the estates category do suppliers recognise that the modern slavery risk in their area is higher (22%) that than of the overall perception of our wider supplier base (16%). This is concerning, but access to this data allows us to look at options to work with contract owners and suppliers to understand and address this apparent anomaly.

**Appendix B: Research, teaching and social responsibility activities**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name and Dept, School** | **Research** **Projects (title, dates, funding and brief description)** | **Research publications** | **Teaching covering modern slavery/PhD supervision** | **Social responsibility: external positions of responsibility** |
| Rose BroadCriminology, School of Social Sciences | ESRC centre for Vulnerabilities and Policing Futures (modern slavery strand) (May 2022-May 2025; ESRC) - barriers to investigation and prosecution and opportunities for early intervention (with Prof David Gadd)Responding to adult victims of cuckooing in Greater Manchester (July 2022 - Dec 2022; UoM ESRC IAA and GMCA) - project aiming to map and identify best practice and areas for improvement in responses to cuckooing in GMProject Honeycomb (May 2021-May 2024; GMCA) - data sharing and nature and shape of modern slavery across GMAssessing the Impact of Modern Slavery Legislation and Increased Awareness in Parliament - Parliamentary Office for Science and Technology Fellowship (Apr 20-Apr 22; ESRC IAA) The Perpetrators of Modern Slavery: Backgrounds, Networks and Motivations (April 2018-May 2022; ESRC) - pathways into offending for modern slavery offenders (with David Gadd) | Broad, R. and Gadd, D. (2022) ‘Demystifying Modern Slavery’ Routledge: London. Gadd, D. and Broad, R. (2022) ‘Facing the Folk Devils of Modern Slavery’ *Critical Social Policy.*Luo, S. Gadd, D .and Broad, R. (2022) ‘The Criminalisation and Exploitation of Irregular Chinese Migrant Workers in the UK’ *European Journal of Criminology.* Lightowlers, C., Broad, R. and Gadd, D. (2022) ‘Temporal Measures of Modern Slavery Victimisation’, *Criminology and Criminal Justice*. DOI: [10.1177/17488958221094988](https://doi.org/10.1177/17488958221094988) Jay S. Albanese, Rose Broad & David Gadd (2022) ‘Consent, Coercion, and Fraud in Human Trafficking Relationships’, Journal of Human Trafficking, 8:1, 13-32, DOI: [10.1080/23322705.2021.2019529](https://doi.org/10.1080/23322705.2021.2019529) Broad, R., Lord, N. and Duncan, C. (2020) ‘The Financial Aspects of Human Trafficking: A financial assessment framework’. *Criminology and Criminal Justice,* currently online<https://doi.org/10.1177/1748895820981613> Lightowlers, C., Broad, R. and Gadd, D. (2020) ‘Victims and Suspects of Modern Slavery: Identifying subgroups using latent class analysis’. *Policing,* 15, 2: 1384–1398 Turnbull, N. and Broad, R. (2020) ‘Bringing the Problem Home: The anti-slavery and anti-trafficking rhetoric of UK non-government organisations’. *Politics*, currently online<https://doi.org/10.1177/0263395720962402>  | Serious and Organised Crime (CRIM30811)Understanding Violence (CRIM70552)One completed PhD student (Presidential funding), one in year three (Colombian national funding) and two due to start with ESRC funding in Sept 2023 all relating to modern slavery | His Majesty’s Prison and Probation Service Modern Day Slavery memberHis Majesty’s Prison and Probation Service Anti-Criminal Exploitation Network memberModern Slavery Policy Evidence Centre Advisory Board Home Office Modern Slavery Unit academic roundtable memberIndependent Anti-Slavery Commissioner academic consultationGreater Manchester Anti-Trafficking NGO Forum and GM Anti-Trafficking Business Forum member |
| Nick Turnbull, Politics, School of Social Sciences | Projects with Rose, as above | Publications with Rose, as above | - | - |
| David Gadd, Criminology, School of Social Sciences | Projects with Rose, as above | Publications with Rose, as above | - | - |
| Edmond Smith, History, School of Arts, Languages and Cultures | The Legacies of the British Slave Trade (1550-1807) (Jan 21-Jan 24; AHRC) - although the project is focused on historical slavery, there are links with modern slavery groups as part of the project. |  |  |  |
| Amy Benstead, Materials, School of Natural Sciences | The role of worker voice in factory audits in the Leicester ready-made garment industry (Jan 23-Jan 25; Leverhulme) The research aims to address how worker voice can most effectively be accessed and incorporated into audit policies.Investigating modern slavery in Prato, Italy (July 2021-ongoing; funded by the University of Bergamo) - the project focuses on engaging with multiple stakeholders (professionals) to understand how local actors can help to address exploitative working practices in Prato and create systemic change. | Benstead, A.V., Hendry, L.C. and Stevenson, M., 2021. Detecting and remediating modern slavery in supply chains: a targeted audit approach. *Production Planning & Control*, *32*(13), pp.1136-1157.Pinnington, B., Benstead, A. and Meehan, J., 2023. Transparency in supply chains (TISC): Assessing and Improving the quality of modern slavery statements. *Journal of Business Ethics*, *182*(3), pp.619-636.Fayezi, S., Benstead, A., Gold, S., Klassen, R. and Van Wassenhove, L., 2021. Special Issue of Production and Operations Management “Modern Slavery in Supply Chains: A Socio‐Technical Perspective”. *Production and Operations Management*, *30*(11), pp.4328-4329. | MATS22601 Operations Management Year 2MATS22102 Fashion Management Year 3MATS34502 Business Ethics, Sustainability & CSR Year 3Rachel Cox, PhD Fashion Management and Marketing, exploring impact of digital tech on garment workers’ working conditions, based on a UK context | Committee member of recently launched BSO standard |
| Jon Davies, Criminology, School of Social Sciences | 'Modern slavery and digitisation in fast fashion supply networks: the transparency dividend'. Oct 2022 to Jun 2023, £8.5k from Centre for Digital Trust and Society. This research is intended to examine to what extent digital tools such as Blockchain and AI are embedded in garment manufacturing supply networks, and how useful digital tools are perceived to be in improving transparency. With Rose Broad and Amy Benstead.'An assessment of the UK's hostile environment: societal and policy implications from Windrush to the present day'. Oct 2022 to Jul 2023, £5k from JRRI. The aim of this project is to assess the trajectory of the UK's hostile environment approach towards migrants, drawing on historical archival research and ways in which migrants have responded/adapted to various pressures. With Rose Broad.'An evaluation of the Western Balkans Serious and Organised Crime Community Coordinator Project'. Dec 2022 to May 2024, £20k from GMCA/GMP. This is an evaluation of a GMP-led project focused on diverting young people in the area of Bury from entering into various forms of SOC. With Rose Broad | Davies, J., and Malik, H. (forthcoming) *The Organisation of Crime in the Construction Industry*. Routledge. Part of research series on ‘Routledge Studies in Organised Crime’. Final manuscript due August 2023. Malik, H., Vanto, J., Lahteenmaki, L., Vatjus-Anttila, J., and Davies, J. (2022) ‘An administrative approach in addressing labour trafficking: a critical review’. *European Journal of Criminology*. DOI: 10.1177/14773708221092330. Davies, J. (2021) 'Criminogenic dynamics of the construction industry: a state-corporate crime perspective'. *Journal of White Collar and Corporate Crime* 3(2): 90-99.Davies, J. (2021) 'Labour exploitation and posted workers in the European construction industry'. In Lord, N., Inzelt, É., Huisman, W., and Faria, R. (eds.) *European White-Collar Crime - Exploring the Nature of European Realities*. Bristol: Bristol University Press, pp. 163-174.Davies, J. (2020) ‘Criminological reflections on the regulation and governance of labour exploitation’. *Trends in Organized Crime* 23(1): 57-76.Davies, J. (2020) ‘Corporate harm and embedded labour exploitation in food supply networks’. *European Journal of Criminology* 17(1): 70-85. | Serious and Organised Crime (CRIM30811) | - |
| Gary Norton, Social Work, School of Nursing, Midwifery and Social Work | - | Some coverage of child safeguarding in the context of exploitation - Norton, G. and Davies, H.R., 2017. *A Child's Journey Through Contemporary Issues in Child Protection*. LexisNexis Butterworths. | For our final year students, I run a safeguarding unit, and I teach modern day slavery, trafficking, and related areas of exploitation (CSE & CCE) |  |
| Ser-Huang Poon, AMBS | 2023 £3385.84 AMBS Impact Support Fund (Leveraging Large Language Model and AI in Business Supply Chains Modern Slavery Due Diligence)2022 £2,000, CAIR Funding Support, Disclosure Quality of UK Modern Slavery Reports.2020 £86,000 Turing and Gates Foundation, “Resilience in Value Chain and Worker Vulnerability Reduction - Trusted digital identity and payments in the supply chain”2019 £19,473.28 from ESRC Impact Acceleration Account, Leveraging Blockchain & Distributed Ledger Technologies for a Sustainable Economy and Society2018 £33,830, Research England GCRF QR, Research Partner Development and Pump Priming2017 £1,500 Digital Humanities (DH) Project Development. “Text Analysis and Machine Learning, Disclosure and rating of Corporate Social Responsibility Performance” | Carpenter, Martin and Ser-Huang Poon (2022) Distributed Data Network: A Case Study of the Indian Textile Homeworkers , Forthcoming *Data & Policy* , Turing managed journals, paper based on Turing funding project in India.Wei, Wyatt Siliang, and Ser-Huang Poon (2022) Disclosure quality of UK Modern Slavery Reports according to Section 54 Transparency in Supply Chains: a machine learning and NLP approach, for presentation at British Academy of Management Conference, August 31st ‐ 2nd September at AMBS, the University of Manchester | Siliang Wei, AMBS Targeted PhD Schlorship 2020-21, Modern Slavery Risk in Business Supply Chains: NLP and Impact to Company Valuation |  2018-2023 Turing Fellow (Trustworthy Digital Identity Interest Group, Digital Finance)ECLAS (Equipping Christian Leadership in an Age of Science) ProjectHACE Hackathon 2022 (with Wyatt Siliang Wei)Scoring Child Labour Risk in Business Supply Chains – the construction of a Child Labour Index.Stop-the-Traffik’s Traffik Analysis Hub Month Calls for Analysts (on going)Enduring Net, Charitable Incorporated Organisation, Founder & Trustee. [Focus on distributed technology, AI, identity and privacy in humanitarian work.] |
| Erick Mendez Guzman, Computer Science, School of Engineering | Explainable Text Classification Framework for Detecting Indicators of Forced Labour (Jan 2021 – Feb 2024 / Funded by the Chilean government): The project aims to evaluate the impact of including human explanations, as extra supervision information, on classifier performance and explainability for a multi-class multi-label text classifier to detect indicators of forced labour. | Guzman, E.M., Schlegel, V. and Batista-Navarro, R.T., 2022, June. RaFoLa: A Rationale-Annotated Corpus for Detecting Indicators of Forced Labour. In Proceedings of the Thirteenth Language Resources and Evaluation Conference (pp. 3610-3625). | - | - |
| Wendy Olsen, Social Stats, School of Social Sciences |  | Kim, Jihye, and Wendy Olsen (2023), Harmful Child Labour in India from a Time-Use Perspective, Development in Practice, 33:2, DOI https://www.tandfonline.com/doi/full/10.1080/09614524.2022.2155620, Open accessShoba Arun and Wendy Olsen (2023), Modern Slavery and Exploitative Work Regimes: An intersectional approach, Development in Practice, 33:2, in Special Issue on Modern Slavery and Exploitative Work Regimes: Policy implications of multiple and differential intersections. DOI: 10.1080/09614524.2023.2173725 Kim, Jihye, Olsen, W.K. and Arkadiusz Wisniowski (2022) Predicting Child-Labour Risks by Norms in India. Work, Employment and Society. doi:10.1177/09500170221091886 Open access |  |  |