

Modern Slavery Act 2015 (the “Act”)

Modern Slavery and Human Trafficking Statement November 2023

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking – all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

The University of Hertfordshire does not engage in or condone the practices of slavery, human trafficking or forced labour and is committed to improving its practices to combat slavery and human trafficking within its supply chains.

This statement is made pursuant to section 54(1) of the Act and constitutes our Group’s modern slavery and human trafficking statement for the financial year ending 31st July 2023.

The University’s organisational structure

The University is a provider of educational learning and research in the higher education sector.

The University of Hertfordshire Higher Education Corporation has, within its group structure, several established subsidiary companies, which are either wholly or jointly owned. Further details on the group structure and its business is available [here](#).

In the financial year 2022/23, our global annual turnover was £384m.

Our supply chains

University procurement follows one of two pathways: (1) collaborative procurement (through regional HE purchasing consortia); or (2) in-house tendering and contracting.

- The University continues to be a member of the Southern Universities Purchasing Consortium (SUPC) which is, in turn, a member of the UK Universities Purchasing Consortium (UKUPC), the representative body for UK regional and specialist purchasing consortia which works to align practices, to add value, to embed sustainable and responsible procurement, and to deliver social value.
- UKUPC has created a Responsible Procurement Network with the aim of achieving a consistent approach across the consortia to responsible procurement. Objectives include: the review of supply chain risks and provision of guidance in building supply chain resilience in relation to ethical procurement, including modern slavery and protecting the environment.
- The University’s procurement function is supported by a published and implemented Sustainability Strategy to which we are fully committed, and which can be found [here](#).

The University's core supply chains include the following:

- Commercial bus operations;
- Estates goods, services and works;
- ICT (Information and Communications Technology) equipment and services;
- Professional services; and
- Science, Technology, Engineering, Mathematics and Medicine (STEMM).

Where do we consider there to be a risk?

The principal categories which are considered to carry material risk are: clothing and promotional merchandising supplies, office supplies, laboratory consumables, ICT equipment, and some estates services (such as cleaning and security services).

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business:

- In light of the obligation to report on measures to ensure that all parts of our business and supply chains are slavery-free, our University Policies and Regulations (UPRs) in relation to [Equality and Diversity](#) and [Procurement](#) – with which all staff and students must comply – contain terms that specifically require that steps be taken to ensure compliance with the Act.
- The policies demonstrate our commitment to acting ethically and with integrity in all our business relationships, and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. A full list of UPRs is available [here](#).

We have zero tolerance for slavery and human trafficking and continue to review all agreements and dealings with suppliers to ensure strict adherence to our values and compliance with the Act. All our standard terms and conditions of contract (used when procuring services from suppliers) include clauses which specifically require compliance with the Act and reporting to the University of any actual or suspected breaches of the requirements of the Act.

Due diligence

Due diligence in relation to modern slavery and human trafficking embraces a range of actions which the University regularly undertakes to mitigate the risk of non-adherence to the Act:

- Members of our staff continue to receive modern slavery training. We hold procurement presentations across the University Group to ensure that staff are aware of a range of regulatory requirements, including the provisions of the Modern Slavery Act;
- All staff are required to comply with the UPRs in relation to their interactions with suppliers;
- All suppliers who contract with us under our standard terms and conditions must comply with our UPRs and with specific contractual terms relating to compliance with the Act;
- The use of consortia frameworks ensures that contractors are properly vetted, and their working practices are regularly assessed for compliance with the Act;

- Responsible Procurement category guides (covering economic, environmental, and social aspects) are used by Category Managers at pre-tender stage to enable informed social consideration decision making;
- Contractor Account Management Meetings incorporate social aspects (e.g. Modern Slavery & workers' rights) as regular agenda items for discussion and documenting; and
- Due diligence completed during tender exercises is recorded in our e-tendering system.

In addition:

- We have incorporated Responsible Procurement into our 2020-2025 Procurement Strategy.
- We have written to all contractors listed in our procurement contract management system, requesting that they certify their compliance with the Act.
- In the past year, no concerns have been raised by members of staff or external contractors regarding modern slavery within the University's supply chains. However, the University continues to monitor compliance.

Plans for the Future

(1) Training

We continue to review the need for further specialist training of our contracts teams to ensure a high level of understanding of the risks of modern slavery and human trafficking within our supply chains.

It is intended that, this coming year, a training session will be held for all procurement, legal and compliance, and audit and risk staff regarding the new Procurement Act 2023, ahead of it coming into force (currently anticipated in October 2024). It is intended that this session will also include update training on the Act.

(2) Other steps

Other steps which we intend to take include:

- Implementing a Responsible Procurement Assessment Tool;
- Continuing to develop our procurement action plan for combatting modern slavery within our supply chains and monitoring our effectiveness;
- Integrating Sustainable Development Goal 8 into our procurement tender process;
- Continuing to identify, assess and monitor potential risk areas within our supply chains to mitigate the risk of slavery and human trafficking occurring;
- Carrying out further work to raise awareness amongst all staff (including those involved in the procurement process) through training and publication of information on internal websites;
- Increasing staff and supplier awareness of University procedures for reporting any actual or suspected modern slavery through appropriate, identified contact points;
- Continuing to consider appropriate performance indicators for evaluating our effectiveness in ensuring that no slavery or human trafficking is taking place within our supply chains, and particularly those identified as carrying material risk; and

- Recording and monitoring any allegations or incidents relating to modern slavery reported to us by staff, suppliers and/or third parties.

In the coming year (2023/24), we will:

- Retain our Electronics Watch affiliate membership (which provides us with monitoring services to ensure compliance with labour rights and safety standards in the supply chains of ICT hardware goods);
- Keep the provisions of our UPRs relating to the Act under review;
- Record all due diligence arising during the contractual procurement process;
- Keep the training of our contract teams and other staff under review;
- Ensure Category Managers retain their Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement certification status;
- Ensure Category Managers assess and capture Responsible Procurement (economic, environmental, and social) aspects during contractor management meetings; and
- Request that contractors self-certify their compliance with the Act.

This statement has been approved and published by the University's Board of Governors and will continue to be reviewed annually.

DR LYNN DRUMMOND

CHAIR OF THE BOARD OF GOVERNORS OF UNIVERSITY OF HERTFORDSHIRE

21 November 2023

Please note that the original signed copy of this statement is lodged with the University's Governance Services Department.