

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR THE PERIOD 1 AUGUST 2020 TO 31 JULY 2021

## 1. Our Commitment

- 1.1** Modern slavery is a crime and a violation of fundamental human rights under the Modern Slavery Act 2015. 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 to exploit them for personal or commercial gain.
- 1.2** The University of Keele (including all group companies) operates under a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3** This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 1.4** The University is committed to a high level of corporate governance. The University, like other public bodies, has a duty to conduct its affairs in a responsible and transparent way, and to consider the requirements of its funding bodies and the Higher Education Code of Governance published by the Committee of University Chairs (CUC).
- 1.5** The University also conducts its business in accordance with the seven principles identified by the Committee on Standards in Public Life (selflessness, integrity, objectivity, accountability, openness, honesty, and leadership). The CUC Code was revised and published in September 2020 and the University is fully compliant. The CUC published a Higher Education Audit Committees Code of Practice in May 2020, which identified the key principles and elements that form an effective Audit Committee. The Council has formally adopted the Code.
- 1.6** The University is also committed to the principles of academic freedom and equality of opportunity in its approach to governance. We are also committed to protecting and respecting human rights by 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 our contractors, suppliers, and other business partners, and as part of our contracting processes, in the coming year we will continue to 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.

## 2. Organisational Structure & Activities

- 2.1** The University of Keele is an independent corporation and is the successor to the University College of North Staffordshire, founded in 1949. The University derives its legal status from the Royal Charter granted in 1962 (as subsequently amended) and the status of its degrees is recognised by the University of Keele Act 1962. Like many English universities, the University is a

charity exempt from registration with the Charity Commission and the Office for Students (OfS) is the principal charity regulator for the University. This means that members of the Council have the responsibilities of charity trustees in relation to ensuring the institution's work is for the public benefit and that it complies with Charity Commission expectations. An internal review of the University's compliance with charity law requirements in 2021 resulted in the Council being provided with a high level of assurance.

- 2.2** The Council is the supreme governing body of the University. It has a collective responsibility to promote the University's well-being and for the proper management and financial solvency of the institution. Major policy decisions, as well as corporate strategy, are also subject to its approval. The Council has a majority of lay members (neither employees nor students at the University) and includes among its members representatives of staff and students. The Vice-Chancellor has general responsibility to the Council for maintaining and promoting the efficiency and good order of the University.
- 2.3** The University Executive Committee (UEC) is the primary executive committee of the University and acts as an advisory committee to the Vice-Chancellor in leading the strategic direction of the University. Membership of UEC comprises of the Vice-Chancellor (chair); the Deputy Vice-Chancellor and Provost; the Chief Operating Officer; Pro Vice-Chancellors; Executive Deans of the Faculties; and Directors (or equivalent) of the professional service functions.
- 2.4** The University is a provider of teaching, research, and enterprise in the higher education sector. Our founding ethos remains at the core of the University's mission to make a difference in society by providing innovative, high-quality education for students from all backgrounds. Building on the University's founding principles, our commitment to promoting equality and valuing diversity is at the centre of our efforts to ensure that all staff and students can flourish and fulfil their potential. Our quality teaching and cutting-edge research is being used to improve the lives of people and address the most pressing challenges across our region, and the entire world.
- 2.5** The University has a global annual turnover of circa £171m and our procurement spend (non-pay) over the 2020/21 financial year was approximately £43 million, with thousands of unique suppliers; is one of the largest campus universities in the UK with the most important facilities located together at the centre of campus, which at around 600 acres is one of the biggest in the UK and is home to approximately 10,000 students.
- 2.6** The University is dedicated to exhibiting best practice in all aspects of corporate governance and is committed to supporting the UK Government's National Action Plan to implement the UN Guiding Principles on Business and Human Rights.

### **3. Our Policies on Slavery and Human Trafficking**

- 3.1** The University endeavours to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- 3.2** The University has comprehensive recruitment procedures and requires all staff participating in the process to undertake recruitment training, which includes content relating to modern slavery and human trafficking to support legal compliance and best practice in this area. Robust checks are carried out to ensure that all new staff have the right to work within the UK. Where it is necessary to hire external agency workers, our staff are directed to specified, reliable and

accredited agencies that have undergone appropriate evaluation through the University's procurement procedures and meet our mandatory selection criteria regarding their employment policies and practices.

- 3.3** The University adheres to The Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about potential corruption, fraud, or unethical conduct within the University. If any modern slavery cases were to be suspected on-site, any alleged violation of human rights would be fully investigated, and formal action taken against any member of staff.
- 3.4** The University recognises that it has a legal duty of care with respect to safeguarding and has put appropriate procedures in place in relation to this. The Safeguarding Policy (and associated Safeguarding Procedure) provides details of the necessary steps to be taken should allegations be raised of harm or abuse (including human trafficking) against children or vulnerable adults.
- 3.5** Our People Strategy and the University's policies covering equality, diversity, safeguarding and whistleblowing can be found via the following links:
- [Equality, Diversity & Inclusion Strategy 2018-2022](#)
  - [Equality Objectives 2018-2022](#)
  - [Safeguarding policy](#)
  - [Whistleblowing policy](#)
  - [People strategy](#)

## **4. Procurement and Supply Chains**

- 4.1** Public sector procurement is governed by the Public Contracts Regulations 2015 (PCR 2015) that implement the EU procurement Directives (Directive 2004/18/EC) – often referred to as “the public procurement rules”. These apply to certain procurements with a total value over a specified threshold. They also require that contracts are awarded in accordance with certain standard procedural rules (e.g., on timescales for the contracting process, information that potential suppliers should provide; and the basis on which bids may be assessed). This legal framework requires contracting authorities to award certain contracts, whether these are subject to the procurement rules or not, in line with EC Treaty principles, including the principles of non-discrimination, equal treatment, transparency, procedural fairness, mutual recognition and proportionality.
- 4.2** In accordance with the procurement rules, it is therefore necessary to ensure that ethical issues are relevant to the subject matter of the contract and consistent with the University's procurement policy based on value for money. This excludes public bodies from considering within the procurement process how companies providing the goods and services manage their business generally, beyond relevant legal obligations such as on health and safety and employment. Ethical considerations that are relevant to the subject matter of the contract may arise where there is a risk to the University from a supplier being unable to deliver the product or service on time and of sufficient quality due to say insufficient health and safety provisions for its employees. If a clear link can be established between poor conditions of employment and the ability or motivation of an employee to maintain required quality standards, this will be relevant to the delivery of services or manufacture of products.
- 4.3** The University's Procurement Strategy outlines our principles and practices for the acquisition of goods, services and building works. We have integrated modern slavery into the University's terms and conditions for purchase contracts. Suppliers are required to:

- a. Comply with the UK Modern Slavery Act 2015 and all other applicable laws regarding anti-slavery and human trafficking.
  - b. Maintain their policies to ensure compliance.
  - c. Perform due diligence on their supply chains and include anti-slavery and human trafficking provisions in their supply contracts.
  - d. Notify the University of any breaches and provide the University with annual compliance reports.
- 4.4** Any breach of these obligations is specifically deemed a material breach of contract, which would entitle the University to terminate such contract with immediate effect where appropriate. If evidence were found indicating modern slavery in our supply chains, we recognise our responsibility to work with others to address this and reserve the right to terminate contracts where serious violations are discovered.
- 4.5** The requirement for suppliers to comply with the Modern Slavery Act and the International Labour Organisation (ILO) fundamental conventions is included in our contract notices, European Single Procurement Document checks, and Invitation to Tender documentation, where relevant. These measures are also in place for non-regulated construction procurements.
- 4.6** The University operates a centralised procurement service for the provision of goods and services and has a Purchase 2 Pay (P2P) management system to ensure that staff only make purchases, other than small expenses, using established processes. New suppliers to the University are onboarded through a rigorous vetting process and are required to complete a self-declaration form to confirm they meet the requirements of the Modern Slavery Act, where applicable. Modern slavery and human trafficking forms part of the University's Sustainable Procurement Strategy.
- 4.7** The University has a supplier database of over 2,000 suppliers and our procurements can either be through a regional Higher Education or other Public Sector purchasing consortiums or through direct contracting. All procurement activities are managed through a centrally controlled Procurement department, which sits within the Finance Directorate.
- 4.8** We recognise there are risks of modern slavery in the supply chains for all types of goods and services procured by the University. The University purchases a wide range of products and services. The main categories of expenditure are as follows:
- Laboratory consumables and equipment
  - Estate-related
  - Professional services
  - Library
  - IT equipment and services
  - Catering
- 4.9** We work with our suppliers using an online tool provided by NetPositive Futures that asks and actively assists all our suppliers to develop an action plan that addresses modern slavery and other key sustainability issues within their businesses and supply chains. In this way, the University is taking proactive steps to ensure its contracting arrangements comply with all the relevant legislation in both areas.
- 4.10** We contact our suppliers to ask them about impacts arising from their business activities, including slavery within their supply chains, and providing an opportunity for them to tell us how they are addressing these issues. The same process is used for all new suppliers. To date 1048 of our suppliers have accessed the tool and we are using the information to understand the status

of these activities in our supply base and to encourage and support good practice.

**4.11** We continue to engage our supply chain to ensure our contracted suppliers are signed up to the supplier engagement tool, NETpositive Futures, which allows the University to offer free bespoke sustainability action plans, including an assessment of their Modern Slavery Statements.

**4.12** To enable us to target our analysis to ensure we focus on areas at potential risk of incidents of modern slavery in the supply chain, we have analysed our supply base and we continue to monitor the following high-risk areas:

- Information technology equipment
- Furniture
- Catering
- Construction and maintenance services

## 5. Information Technology Equipment

**5.1** The University is an affiliated member to [Electronics Watch](#), the independent monitoring organisation that aims to help public sector organisations work together to meet their responsibility to protect the labour rights and safety of workers in global electronics supply chains more effectively than any single public buyer could accomplish on its own. Full members benefit from Electronics Watch affiliation, including access to guidance, resources and contract clauses that support responsible procurement.

**5.2** Electronics Watch's aligned terms and conditions have been embedded within various Public Procurement awarded IT framework agreements used by the University. Suppliers provide details of the factories in which the ICT equipment we buy are produced, and Electronics Watch works with civil society organisations in the countries where the factories are located to monitor working conditions.

**5.3** The University purchases most of its IT and IT consumables from framework arrangements that are managed by a Higher Education consortium: the London Universities Purchasing Consortium. The University is a member of The North Western Universities Purchasing Consortium (NWUPC). NWUPC is an affiliate member of Electronics Watch on behalf of its members. Affiliate MEMS can access the following tools and events: (Internal Procurement Staff only):

- a. [Workers' Grievances in Electronics Manufacturing in China](#): A Study of Dell's and HP's Supply Chains, London Universities Purchasing Consortium contributed to this study along with the Stockholm County Council, Advanced Procurement for Universities & Colleges, and Hanzhohogeschool. The study seeks to understand electronics workers' grievances in China through the lens of their social media posts, collected with the Social@risk™ tool. The quantitative sample consists of 1.3 million posts from January 2014 to April 2018. The qualitative analysis sample includes 600,000 posts from January 2016 to April 2018. All posts are related to 38 final assembly and original design manufacturers (ODM) suppliers to Dell and HP. The study highlights workers' grievances related to forced labour, student labour, excessive working hours, and health and safety among other areas. The report identifies priority issues for workers that need particular attention or new approaches.
- b. [Public Buyer Toolkit](#): Supports communication and promotes contract performance compliance within affiliates' supply chains. It contains standardized and easy-to-use tools like the Letter to Suppliers, Factory Disclosure Form, Guidelines for Disclosure of Factories, and the Electronics Watch Contract Conditions.

- c. [Affiliate Action Guide](#): Summarises Electronics Watch compliance findings and recommended affiliate actions for 15 factory cases. Electronics Watch engaged 11 brands on those cases.
- d. [Company Performance Tracker \(CPT\)](#): developed in 2018 and launched in 2019, the CPT scores contractors' and brands' supply chain transparency and efforts to remediate labour rights violations in specific factories based on their interaction with affiliates and Electronics Watch. While the methodology will be publicly available and regularly reviewed and updated, the CPT scores will only be available to affiliates.

## 6. Furniture

- 6.1 As a member of NWUPC, the University purchases most of its furniture from frameworks that are managed by the NWUPC. The levels of risk have been identified within the category strategy document by the NWUPC and appropriate actions considered.
- 6.2 The University monitors risk at regular review meetings with suppliers using supplier action plans which have been developed using the NetPositives Future tool.

## 7. Catering

- 7.1 As part of the University's Sustainable Food Policy the University prioritises ethical and responsible sourcing by (a) purchasing high welfare meat and dairy products; (b) sourcing sustainable seafood that is Marine Stewardship Council certified; and (c) sourcing fairly traded food, drink, and other products for our operation.
- 7.2 The University purchases food through frameworks which are managed by The University Caterers Organisation Ltd which is committed to ensuring that there is no modern slavery or human trafficking within its supply chains.

## 8. Construction and Maintenance Services

- 8.1 The University procures most of the construction and maintenance services in line with its tendering procedures, whereby all construction procurements (irrespective of whether the value of the works is above or below the OJEU threshold) include as part of the selection stage evaluation a pass/fail assessment requiring the tenderer (and each key subcontractor/member of the bidding consortium as applicable) to confirm that either:
  - a. they are not a relevant commercial organisation as defined by section 54 of the Modern Slavery Act 2015; or
  - b. they are a relevant commercial organisation and can demonstrate compliance with the annual reporting requirements contained within section 54 of the Modern Slavery Act 2015.
- 8.2 This approach is consistent with the Government's Procurement Policy Note: Standard Selection Questionnaire. Successful contractors are encouraged by the University to follow the Ethical Trading Initiative Base Code which is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice.
- 8.3 The University will occasionally procure works via a call-off under an existing public sector framework agreement established by another contracting authority but will still include the same Modern Slavery pass/fail assessment within the further competition evaluation. Large

maintenance services contracts procured by the University also follow the same approach.

## 9. Staff Training and Awareness

**9.1** As a University, we work in collaboration to build a sustainable, high performance organisation in which all staff and students are fully engaged and who are enabled to make an effective and relevant contribution.

**9.2** Equality and diversity are at the heart of the University's Strategic Plan in terms of the services and opportunities we provide, and through valuing the rights, responsibilities, dignity, health, and wellbeing of all individuals in the University.

**9.3** We are continuing to undertake the following steps to raise awareness and understanding regarding the issue of modern slavery and human trafficking in our supply chains both internally and externally:

- A group of senior University officers oversees current awareness activities and meets at least annually to ensure adequate awareness-raising is taking place.
- The group ensures that the University's annual Modern Slavery and Human Trafficking Statement is up to date. The statement is approved by the University Council and signed by the Vice-Chancellor.
- Training is undertaken by staff in those functional areas identified as requiring significant awareness of the risks regarding modern slavery such as Procurement and areas of commercial and Estates-related activities, over 100 staff have completed an e-learning module on Modern Slavery and Human Rights.
- A human rights professor from Keele's School of Law has been appointed to a prestigious post by the United Nations Human Rights Council, to help tackle modern slavery around the world. Professor Tomoya Obokata, an expert on human rights and international law, has been appointed as the Special Rapporteur on Contemporary Forms of Slavery at the recent UN Human Rights Council meeting in Geneva. Professor Obokata's post is often referred to as a human right "expert on mission" and involves working with a number of international stakeholders to tackle modern slavery in all its forms across the globe. Working alongside governments, non-government organisations and other international partners, Professor Obokata will examine and report on slavery and slave-like practices around the world, Professor Obokata's appointment is a testament to his world-leading expertise and research in this field.
- Keele University researchers Professor Tomoya Obokata and Dr Forough Ramezankhah have published a [new report](#) into the impact of Covid-19 on modern slavery which details best practice and recommendations for the protection of vulnerable workers from the effects of the pandemic.

## 10. Our Plans for the Future

**10.1** We commit to better understand our supply chains. We will continue to implement and develop the following action plan to identify and mitigate any risks that Modern Slavery and Human Trafficking represent in our business and supply chains:

- We will continue to raise awareness of modern slavery issues amongst our suppliers and staff, encourage transparency amongst our suppliers and continue to carry out supplier risk assessments where concerns arise.
- We will continue to review existing policy statements and introduce additional governance around the University's ethical investment policy, fundraising and income generation and

research, teaching & partnerships to specify our commitments and responsibilities in these areas.

- We will share our due diligence practices in relation to modern slavery and human trafficking with our suppliers and partners.
- We will review and monitor supplier action plans through regular contract management and support initiatives to reduce the risk of modern slavery and human trafficking occurring.
- We will continue to review and monitor supplier action plans developed through the NETpositive toolkit.
- We will continue to provide training for relevant staff on compliance with the Modern Slavery Act 2015.
- We will continue to review and update all relevant policies and controls to embed awareness in relation to modern slavery and human trafficking.
- We will continue to develop further research collaborations related to modern slavery risks and solutions.

**This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the University of Keele’s modern slavery and human trafficking statement for the financial year beginning 1 August 2020 and ending 31 July 2021. It sets out the steps the University has taken across our research, teaching and operational activities in relation to slavery and human trafficking in our supply chains and within our own organisation.**

Professor Trevor McMillan | Vice-Chancellor | University of Keele

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