

UK Modern Slavery Act 2015 Transparency in Supply Chains: Reporting by Higher Education Institutions

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***BHRE Research Series. Policy Paper no. 8
April 2023***



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Introduction

This Research Report analyses the progress in transparency reporting by Higher Education Institutions (HEIs), such as universities and research institutes, in compliance with their obligations under the UK Modern Slavery Act 2015 (MSA). It is the latest report in the BHRE Research Series, which continue to provide in-depth qualitative analysis of modern slavery reporting by public bodies on their efforts to combat modern slavery and human trafficking in their supply chains. This Research Report covers the reporting undertaken by HEI since our previous two reports which focused on the first two years of reporting of 2015/2016 and 2016/2017.

With a limited number institution keeping a historical record of their previous modern slavery statements, which is further discussed below, our research focuses on the most recent statement available, mainly covering the 2020/2021 and 2021/2022 reporting periods.

Since the beginning of modern slavery reporting under TISC, a total of **142** HEIs have published a modern slavery statement, which remain accessible online. In our research, we have identified a total of 165 HEI which have engaged with the reporting exercise.

About the MSA 2015

The MSA received Royal assent on 26 March 2015. On 29th October 2015, Section 54, known as the Transparency in Supply Chains Provision (TISC), came into force. As is well known by now, the TISC provision of the MSA requires commercial entities to annually report on all actions taken to identify, prevent and mitigate modern slavery in their supply chains. The aim of the provision is to encourage commercial entities to investigate their supply chain and the effects of their activities upon others, and to communicate this knowledge internally and externally.

Modern Slavery Act (2015)

Section 54(4): A slavery and human trafficking statement for a financial year is—

(a) a statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place—

(i) in any of its supply chains, and

(ii) in any part of its own business, or

(b) *a statement that the organisation has taken no such steps.*

[Emphasis added]

Only commercial entities with a total annual turnover over £36 million have been required to publish their annual Slavery and Human Trafficking Statement. The public sector is not subject to the TISC provision yet. However, as the [Government's Transparency in Supply Chains: a practical guide 2021](#) (hereinafter the Guide) clearly states, education providers and the third sector i.e. charities, which many HEIs are

classified as, are required to report in accordance with the MSA if they meet the turnover criteria.

We recognize that publishing a MSA Statement exposes organisations and subject them to scrutiny of their actions and principles. Reporting on modern slavery risks in supply chain is not a simple reporting exercise but a challenging learning process to develop due diligence in decision making processes when purchasing and contracting goods, services and works. It calls on organisations to provide national and international leadership in sustainable and socially responsible practices. UK HEIs should be at the forefront of these efforts.

About this Report

This Report, as our previous ones, reflects on the quality of the statements, analyses compliance with the formal requirements of the law and, finally, analyses the substantive content that HEIs disclose in their statements to highlight good practice and encourage improvement.

This Research Report has analysed 142 statements from HEIs publicly published by September 2022. All the statements found and analysed are listed in Annex I.

In Annex II we have included an updated Aide Memoire to support organisations in their sustained journey towards being part of the solution to modern slavery in supply chains, rather than one more element in the

long chain that perpetuates the abuse of those who produce the products they purchase and provide the services they contract.

As this Report highlights, HEIs continue to make progress in assuming their responsibility to combat on modern slavery in their supply chains and be transparent about it. Reporting frequency and quality of the statements remain high. With this research report, we are looking to identify the new and innovative ways in which HEIs engage in modern slavery due diligence, having moved passed the learning period that characterised the first years of reporting. It also highlights some of the deficiencies which the sector should address.

Organisations now have increased resources to support their responsibilities, including the new [Modern Slavery Statement Registry](#), where companies and public bodies can add their statements to be more easily accessible and the [Modern Slavery Assessment Tool](#) (MSAT), provided by the government as an identification and management tool to help public sector organisations work in partnership with suppliers, and which public sector organisations are encouraged to use.

We hope this Research Report will further assist HEIs in their journey to enhance their practices on combatting modern slavery in their supply chain and report appropriately on it.

In the following sections we first consider how universities have responded to the mandatory requirements set out in the TISC provision before moving on to provide an in-depth analysis of the content of the statements.

Impact of Covid

Notably, the current statements were produced during the height of the global Covid-19 pandemic.

The Covid-19 pandemic has impacted on working conditions across the globe but has also provided further visibility to exploitative conditions and the risks in global supply chains, which should have acted as an eye opener to those institutions which had not previously considered this to be a direct concern.

The latest [Global Estimates of Modern Slavery](#) by the International Labour Organisation estimates that fifty million people were living in modern slavery in 2021, of which 28 million were in forced labour. This is a significant rise, ten million people more in modern slavery than the estimated in 2016. Sadly, this may only continue to rise in the economic crisis we are facing in the coming years.

The global Covid-19 pandemic has also created an additional strain on all institutions. With the additional responsibilities, vastly changed priorities, and unforeseen spending, reprieve has to be provided to HEIs if they have failed to

engage with the reporting process during this period. However, few HEIs refer to the pandemic or its impact in their statements, regardless of whether in relation to modern slavery risks or to the institutions' own situations. Those that do include [Lancaster University](#) which, in passing, state that raising awareness through training of staff involved in purchasing has continued through the pandemic, whilst [University of Manchester](#) states they had to pause their supplier training events. [University of Manchester](#) further states that suspending their teaching and research activities, and the changes resulting from the altered operational activity, further impacted their spending patterns and risk profile, such that their constructions spend (a universally identified higher risk service areas) was reduced but their invested in IT (a recognized higher risk goods areas) and accessories, increasing their spend.

The [University of Leeds](#) states they have not terminated contracts as a result of COVID-19, choosing only to pause or extend agreements where necessary.

Few HEIs reflect on the significant impact which Covid 19 had on working conditions in supply chains, which became wildly known during the pandemic, revealing and publicizing the abusive conditions many workers are exposed to.

The [University of Edinburgh](#) notes that the "Covid-19 pandemic has increased the vulnerability of many groups to human trafficking and modern slavery; particularly

women and migrant workers. The economic downturn, travel restrictions and reduced scrutiny of working conditions has left many workers stranded without income or at risk of exploitation from employers.”

[Canterbury Christ Church University](#) identified the increased risk of modern slavery in supply chains “due to COVID 19 restrictions” and that the increased “need to monitor health and safety in working practices for social distancing has highlighted the importance of due diligence checks of suppliers.” The university response has been to continue completing checks at the tender stage, and states that the procurement team and purchasing managers are aware of the heightened risk. Particularly alarming were the report of abuses, including modern slavery, in the supply chain of personal protective equipment (PPE). We found surprising that only the [University of London](#) mentioned this risk in their statement.

Mandatory (Formal) Requirements

The TISC provision makes it mandatory for entities to publish their MS statement on their website with a link in a prominent place on their homepage or in a relevant and obvious dropdown menu. Statements must also be approved at the highest level of governance of the institution and signed by one of the most senior members of the

organisation. Statements of HEIs are almost universally adherent to those two requirements.

1. Accessibility

Statements ought to be easily accessible on the webpages of the reporting organisations. The vast majority of the institutions analysed in this report, did so.

s.54(5) MSA 2015:
“... include a link to the slavery and human trafficking statement in a *prominent place on that website's homepage.*” [Emphasis added.]

In the course of our research we found that when statement cannot be identified on the homepage, it was easily identified using the search function on the universities' websites.

HEIs, as all other organisations, are encouraged to use the [Modern Slavery Statement Registry](#) to deposit their statements.

2. Signatures

Signed statements feature signatures from the Vice-Chancellor or Chief Executive (which oftentimes are roles held by the same person), or some other core leading role such as Chair of Governors or Chair of the University Council. A number of other representatives have also signed the statements such as Chief Operating

Officerⁱ, School Secretaryⁱⁱ, Directors of individual departments.ⁱⁱⁱ

Some statements do not include physical signatures, but merely provide the names of the persons who approved them.^{iv} Conversely, [University of Arts London](#) and the [University of Edinburgh](#) statements were signed with a physical signature as on behalf of the Court of Governors but did not provide the name of the person who signed or their exact role. Other statements merely indicate that approval has been granted by the Board of Governors or Group Leadership Team.^v

In light of the present trends and the requirements of TISC, BHRE suggests that statements should be signed by the Vice-Chancellor, or a Chair of the Board of Governors, as the purpose of the signatures on the MS statement is to show that the approval process is at the highest level of governance of the institution and reflects an overall commitment from those in positions of authority.

3. Annual Review

One of the mandatory requirements of the MSA 2015, is that the MS Statements are published annually for every financial year, and thus, statements should report on actions taken during the past financial year. Organisations should publish their statements as soon as possible after their financial year ends, and in any event the government Guide establishes that it is

expected that they do, at most, within six months of the end of the financial year.

In a situation where no actions have been taken, an institution can, by virtue of s. 54(4)(b), state that it has taken no steps or no new steps in the past financial year and avoid inadvertently portraying its past or continued activities as new or innovative.

Analysis of whether an institution has truly reflected on their activities and updated their annual MS statement, or whether it has been republished, is made more difficult by the lack of historical records kept publicly available (see section Historical Record below).

4. Historical Record

It remains rare that universities keep an accessible record of the MS statements they have published over the years. We have noted in our previous reports on both reporting by universities and by local authorities, that entities tend to replace old statements when they publish a new one.

As in our previous reports, BHRE strongly advise that universities maintain a historical record of their past statements on their website to facilitate comparisons and reflections on the progress they have made.

Institutions can also utilise the Government's Modern Slavery Statement Registry which will automatically retain the old statement record if added as a PDF.

Utilising the Registry, in addition to featuring the statement on the website, will improve access and will ease the burden on the institution to maintain the record.

5. Responsibility for Drafting the Statement

From our research it is unclear which departments are responsible for drafting and maintaining the modern slavery statements. It is good practice for the statements to be drafted through internal collaboration between various departments, such as procurement, human resources and legal, for example. This ensures that the institution both understands the activities undertaken by its various department and that MS due diligence is applied across the organisation.

Thus, BHRE emphasises that a MS statement should be written collaboratively by representatives from different departments.

Substantive Content

Subsection 5.2 of s.54 provides a non-exhaustive list of information that may be included in statement.

Section 54(5): An organisation's slavery and human trafficking statement may include information about—

- (a) the organisation's structure, its business and its supply chains;
- (b) its policies in relation to slavery and human trafficking;
- (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- (d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;
- (f) the training about slavery and human trafficking available to its staff.

For our analysis we have grouped some of these criteria and present our findings as follows: 1) the organisation's structure, its business and its supply chain; 2) organisational policies; 3) due diligence, risk assessment and response, including effectiveness of such response, and; 4) training.

1. The organisation's structure, its business and its supply chain

Effective reporting can only be achieved if organisations have a good understanding of their own supply chain and how this is structured in terms of suppliers, contractors and subcontractors, as well as the origin of the products, materials and services which are used in their activities. Only with this in-depth knowledge can they assess the levels of risks present in their supply chains and how their purchasing decisions affect those who produce the products they buy and provide the services they contract. The government Guide highlights that a greater level of detail is likely to be more helpful. However, it also warns that too much technical or legal information reduce accessibility to the public.

The most common information included in the statements analysed is that on the services provided by the institution, number of staff, number of students, and total expenditure. Most HEIs stop short of providing a full summary of their structure, business and supply chains. Institutions have taken different approaches to report on their structure and business and we explore some of the detail provided below.

[Nottingham Trent University](#) reports it had an income in excess of £370 million and a procurement spend of £120 million. The [University of Manchester](#) reports that “[i]n 2021 [they] had 40,485 undergraduate and postgraduate students [...] are one of the

largest employers in Greater Manchester with 12,920 academic and support staff and an annual income in excess of £1 billion.” The University also reports that they have “transacted with over 6,000 suppliers and had an invoiced spend of approximately £491 million.”

Most statements identify that the universities are charities,^{vi} where applicable. [Queen Margaret University](#) sets out the legal background to its formation stating that it “is registered under the UK Companies Acts as a company limited by guarantee” and “[i]n accordance with the Companies Acts and the University’s Statutory Instrument, the University Court is responsible for the strategic development of the University, and for ensuring that the affairs of the University are administered and managed appropriately.”

[Liverpool Hope University](#) states it is a Private Limited Company by guarantee without share capital of ‘Limited’ exception. It provided its company number and charity registration number.

Universities also refer to their various subsidiaries with varying detail.

[BPP University](#), which is a private company, states that BPP Holdings Limited is the parent company of the BPP Professional Education Group and that their statement “covers the steps taken by BPP Holdings Limited and the following companies within the BPP Professional

Education Group: BPP University Limited, BPP Professional Education Limited, BPP Learning Media Limited, BPP Services Limited and BPP International Limited.”

Conversely the [University of Bolton](#) lists its subsidiaries (Bolton College, Alliance Learning, the Anderton Centre and UOB Services Ltd) in the statement stating that they are part of the University of Bolton Group but that the statement is made on behalf of the University of Bolton only.

[University of Reading](#) states that their subsidiary companies operate in the United Kingdom, Malaysia, South Africa, and Germany. However, the statement fails to identify those subsidiary companies nor link to the University’s Ordinances. For a fully compliant modern slavery statement, such information should be included.

[University of Chichester](#) states that it has one wholly owned subsidiary “Chichester Enterprises Limited and provides the company number (5162778), and then also refers to the institutions it “is associated with, but legally separate from, the University of Chichester Students’ Union (company number 11937134) and the University of Chichester (Multi) Academy Trust (company number 8595545).”

[Middlesex University](#) identifies that it has “two wholly owned subsidiary companies in the UK” and further several overseas subsidiaries located in “Hong Kong, Dubai, India, Malaysia and Mauritius, which act as

local recruitment offices and support Alumni activity”.

The next point of focus for the statements should be the actual governance structure or hierarchy within the organisation. Many universities do not provide this information explicitly but provide hyperlinks which can be followed. We have found that many such links lead to general sites where governance is not described but where the reader is forced to look further for information.

[Institute of Cancer Research](#) correctly provided a working link to the Board of Trustees site which lists who sits on the Board. The statement by the [London School of Hygiene & Tropical Medicine](#) was the only one identified which linked to a thorough hierarchy chart. [London Metropolitan University](#) and [London South Bank University](#) both provided a brief and short graphic showing the governance structure within their statements.

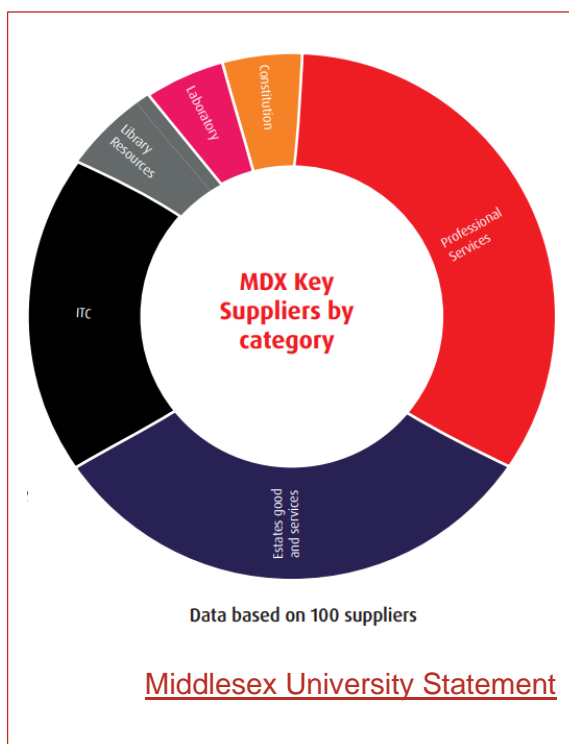
[University of Portsmouth](#) engaged in describing the hierarchy of governance within the body of the statement by describing the activities of the various arms of the University.

“University’s Board of Governors is responsible for determining the educational character of the University, the mission of the University and for the oversight of its activities. The Board of Governors conducts its work

through a number of committees. The University Executive Board is the senior executive decision-making body of the University, it is chaired by the Vice Chancellor and its membership includes the Deans of each of the University's five faculties, the Deputy Vice Chancellor and Chief Operating Officer, the Deputy Vice Chancellors, Pro-Vice Chancellors, the Executive Directors of Finance and Corporate Governance, and the Chief People Officer.”

Explanations, such as the above, make the statement more accessible to the reader who could be any interested party, such as a student, staff member or even a supplier.

Lastly, our analysis turns to the understanding demonstrated by HEIs with regards to their supply chains.



[Middlesex University](#) provided a diagram showing the proportionate breakdown of their supplier by category.

The goods, services and works contracted by the [Heriot Watt University](#) follow a similar categorisation: “construction works; workshop supplies; furniture; electronics including computers and audio visual; travel services; laboratory and research supplies including equipment, chemicals and pharmaceuticals; books and printing; professional services”.

Overall, this did not significantly differ across other statements were universities list their purchases and category spend.

One of the most accurate and detailed descriptions in relation to organization structure and supply chains was provided by the [University of Edinburgh](#). Their statement as an example of good practice. Firstly, the statement provided that the “Universities (Scotland) Acts make specific provision for three major bodies in the Governance of the University: Court, Senate and General Council” and the “University is organised into three colleges (College of Arts, Humanities & Social Sciences, College of Medicine & Veterinary Medicine and College of Science & Engineering), a Finance Directorate and three professional services Groups (Corporate Services Group, Information Services Group and University Secretary’s Group”. Further, the statement went to state that the university has “liaison offices in Chile, China, India, Singapore and the

USA, and collaborative ventures (teaching, research and outreach) in China and India.” The procurement spend in 2020/21 was noted as “approximately £266 million” having “awarded 138 regulated public procurement contracts during this period for a value of approximately £72 million, with 76 of these won by small/medium contractors and 90 by micro/small/medium contractors.” Lastly, the statement identified that “[t]wenty-four million of this spend came through collaborative contracts (66% with APUC, and 34% with other), and [the university] spent £55K with supported businesses.”

Newcastle University statement also identified the supply chain spend breakdown for the reporting period and the spend and vendor breakdown for across world regions.

Harper Adams University retained their references to first tiers suppliers. Lancaster University too makes references to their Tier 1 supply chain in the context of their risk assessment.

Unfortunately, it appears that a number of universities have simplified their statements and no longer include the detail that they initially had.^{vii}

2. Organisational policies

This section remains the most often reported on by universities. References to various policies were found throughout our research and analysis. These include the following policies or procedures: Whistleblowing, Codes of Conduct, Recruitment, Procurement, Equality and Diversity, Anti-Bribery/Anti-Corruption/Anti-

Newcastle University Statement:

Category	2020 / 2021
Professional & Bought-in Services	25%
Laboratory Supplies & Services	23%
Miscellaneous/Unclassified e.g. Utilities, Rent, Recharged Research Staff Costs etc.	15%
IT & AV Supplies & Services	14%
Estates & Buildings Works & Maintenance Costs	11%
Others	12%

Region	Year 2020 / 2021	
	% of Vendors	% of University Spend
UK	84.3%	88.4%
Rest of Europe	7.6%	4.6%
Asia	2.8%	3.8%
North America	4.8%	2.6%
Australia	0.2%	0.4%
Africa	0.3%	0.1%
South America	0.0%	0.0%

Fraud and Public Interest Disclosure.

As BHRE advised in its other reports, this section of the statement is one which requires less frequent updating during annual reviews, only needing to be amended if policies have been updated or new ones implemented.

However, most HEIs fail to point at the relationship between the various policies and modern slavery. Some detail was, however, provided through description of the policies and what they cover. The importance of linking policies back to modern slavery gives stakeholders reviewing the policy context in how they are applied and how they can assist in modern slavery due diligence.

Unfortunately, there are some HEIs which still merely reflect on their 'strong commitment' towards human rights and anti-slavery sentiments, rather than provide any policies that reflect this commitment.

It is inadequate, especially after the length of time in which the TISC provision has been into force, for statement to say that policies are 'being reviewed'.^{viii} Institutions should have already undertaken these review procedures to include their modern slavery commitments. Furthermore, merely listing policies in a bullet point format, with no hyperlinks, no explanation of what the policies cover and no links to MS is also inadequate.

Good practice is represented by those HEIs which have made the effort to

describe what the policies cover. [Wrexham Glyndŵr University](#) provides thorough context to the policies that it lists. [University of Kent](#), for instance, describes that its Whistleblowing Policy "encourages all of its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that might give rise to an enhanced risk of slavery or human trafficking." This is clear step towards linking the policy back to modern slavery and how it plays into the due diligence process. The same is being done by the [University of Winchester](#), for instance, where it describes its Ethical Investment Policy as having been "developed to reflect [their] commitment to ensuring that [their] investments are not complicit in any human rights violations, in so far as possible. To this extent the University does not knowingly invest directly or indirectly in organisations that breach human or animal rights or that are in breach of the Modern Slavery Act 2015."

A number of universities have some form of a dedicated anti-slavery policy.^{ix} Statements which refer to a single anti-slavery policy, however, are visibly less likely to then go on to describe any other relevant policies. [University of Manchester](#) is one of the exceptions as it further refers to their Adult Safeguarding Policy, Procurement Policy and Supply Chain Code of Conduct. It states that the

Procurement Policy “sets expectations around legal compliance including modern slavery” and “makes specific reference to the UN Sustainable Development Goals (SDGs)” such as “SDG 8: Decent Work and Economic Growth, [which] highlights a zero tolerance of forced labour, modern slavery and human trafficking by encouraging the protection of labour rights and working practices across supply chains.”

[University of Warwick](#) also lists additional policies further to their Modern Slavery Policy, such as the Health and Safety Policy and the statement further refers to “a code of conduct which contractors engaged by the University must adhere to” which “includes a range of provisions to ensure that workers are protected and their rights are enforced, including the requirements that contractors must: (i) Satisfy themselves that they and anyone they employ or engage are competent and adequately resourced; (ii) Plan, manage and control their own work to ensure any workers under their control are safe from the start of their work on site, and (iii) Provide workers under their control with any necessary information they need to work safely, report problems and respond appropriately in an emergency.” Ideally, the statement should have described why this is important for modern slavery monitoring purposes.

The government Guide makes it clear that organisations need not have a standalone policy in place - but may develop one or

explain how current policies and practices are relevant to the cause. In absence of a standalone policy, BHRE encourages Universities to take the time to both hyperlink the policies they list in their statements for ease of access, and to provide context and explanation on how the policies impact their modern slavery due diligence.

In our last report, we also noted on the importance of policy circulation as staff need to be aware of the responsibilities of their employers and crucially are integral in spotting signs of slavery, raising concerns, and implementing the organisation’s strategies in ensuring that no violations take place in its activities.

Any general awareness raising by universities among staff regarding their policies alone, is not an action that merits being reported under modern slavery training. It is, however, vital in implementing those policies and HEIs should ensure that staff are aware of their various policies, their effect and how they are implemented.

3. Due diligence, risk assessment and response, including effectiveness

Human rights due diligence is a process which requires assessing the risks that the organisation’s own activities pose to the human rights of those affected by such

activities. It further involves taking measures to prevent, mitigate and remedy the harmful impacts identified. Due diligence processes inherently demand an on-going assessment of modern slavery risks, and involve the assessment of both actual and potential risks, as well as designing and monitoring of actions undertaken to address them by preventing, mitigating and remedying instances of modern slavery. Due diligence is not a static process – measures need to be regularly reviewed and should be modified accordingly. This can only be done through engagement with the relevant actors centrally suppliers, to address both the risks and identified instances of modern slavery.

This section analyses how HEIs have reported on their efforts to exercise due diligence to mitigate and prevent instances of modern slavery and human trafficking by addressing the following elements: a) Assessing and prioritising risks; b) engaging with bidders and suppliers in risk assessment and response; c) collaboration; d) measuring effectiveness.

a) Assessing and prioritising risks

Institutions report on similar risk being identified when they carry out a risk assessment. The identified areas of risk tend to correctly include those that are commonly known as being higher risk, such as:

- IT / ICT Equipment
- Laboratory Equipment
- Clothing and Textiles
- Construction
- Catering / Food Chains
- Estates Services

Institutions which report on carrying out a risk assessment, rarely describe their process. This lets us to believe that the risk assessment being carried out remains rather rudimentary.

Rarely do statements identify tiers of suppliers or explore why they have identified specific areas as higher risk. The statement of [University of Edinburgh](#) goes further as it explicitly states the University worked with their Tier 1 suppliers to address the identified issue around glove suppliers in Tier 2. [Manchester Metropolitan University](#) statement identifies that modern slavery risk increases as the supply chain extends and noted four distinct levels: 1. their own operations and workforce; 2. their Tier 1 (direct) suppliers; 3. their Tier 2 (indirect) suppliers; and 4. their international partnerships. The University states that it encourages their suppliers to map their own supply chains and provide evidence of how they risk assess their supply chains and inform the Contract Manager should they identify modern slavery.

[University of Lincoln](#) also focuses on Tier 1 suppliers and notes those range from micro

businesses to large global companies, and the statement provides that they seek to work with those Tier 1 suppliers to encourage them to take positive action on managing modern slavery risk further down the supply chain. The statement identified a core problem when it comes to an in-depth risk assessment by stating that it is not “practical” for the university to formally map their supply chains.

Although, a supply chain review and risk identification should cross over to supply chain mapping and risk assessment, we understand that there are limited resources that Universities can dedicate to their procurement due diligence. As the government Guide points out, appropriate resources need to be deployed to ensure that risk assessment strategies can be effective. As we noted in our previous report, this is always difficult, considering the competing social demands public institutions must tend to and the limitations and constraints that the public procurement legal regime establishes on secondary priorities. Furthermore, it may be difficult to map supply chains fully where much of the public procurement undertaken by HEIs through consortia led framework agreements.

Unfortunately, there is still a large section of statements that fail to recognise that there is any risk in their supply chains. Other statements show understanding of some risk but deflect that any such risk affects them. For instance, the [Heriot-Watt](#)

[University](#) statement states that the risk of modern slavery in their “direct activities is likely to be low as a result of the controls and systems that the University has in place” whilst recognising that there “are potential risks of modern slavery occurring related to [the University’s] international activities, particularly in high-risk countries.”

A similar approach was found [in University of London](#)’s statement which states that most of their supplier are “headquartered in the UK” but also states that “suppliers often import products and services from international sources, and [the University] recognise[s] that a significant amount of purchased goods are produced and assembled outside of the UK, sometimes in higher risk countries.”

Whereas [Wrexham Glyndŵr University](#) identified their high risk areas and their spend in those areas but stated that “for most of the high risk spend areas, the University uses national or regional framework agreements and the risk of modern slavery and human trafficking by our direct suppliers is considered low.”

[University of Exeter](#) concedes that the approach to the risk assessment was to identify the potential sectors and suppliers where issues around human trafficking have historically arisen. Once the University identifies those, the statement goes through each sector one by one and further assesses whether the University has an increased risk in this area. For

Figure 2: Understanding our suppliers – a summary of the 10,417 sources of supply by category risk for 2019/20.

High risk 51% of our suppliers		
Level 1 category codes	Number of Level 2 codes	Supplier count*
C – Catering supplies and services	21	360
F – Furniture, furnishings and textiles	20	126
G – Sports science and recreation	9	80
H – Janitorial and domestic supplies and services	13	113
K – Computer supplies and services	23	388
L – Laboratory/animal house supplies and services	102	2,876
M – Workshop and maintenance supplies including engineering	19	843
W – Estates and buildings	27	498
Y – Facilities operations	17	0
		5,284

[University of Nottingham Statement](#)

instance, in relation to the clothing sector, the University assess its risk to be low as most ‘members of staff do not wear a uniform’. However, in reference to outsourced cleaning services the University assesses its risk to be medium but also states it “is managed through robust due diligence checks”.

[Queen Mary, University of London](#) used the Sustainable Procurement Prioritisation tool designed by DEFRA (Department for Environmental Food and Rural Affairs) in order to carry out its risk assessment analysis. Their modern slavery statement describes that the tool “provides outputs based on: influence, scope and risk” and that “[f]rom a social perspective the tool considered:

- Human Rights / Working Conditions
- Education and Skills Training
- Local Employment and

- Apprenticeships
- Local Community Engagement
- Diversity and Inclusion
- Small and medium sized enterprise support”.

Such a description provides the necessary context needed to understand how the risk assessment was approached. All institutions are encouraged to explain how they arrived at their identified areas of risk.

[University of Nottingham](#) states its procurement team has gone a step further by “comparing the known high risk commodity codes to annual spend by the university on products in these categories and the number of suppliers used to supply the products and services.” The statement includes the full breakdown of the results for high, medium and low risk areas identified. Further, this is a very thorough way of showing the results and allows the

reader of the statement to visualize the risk, but also provides the necessary context to how the risk assessment had been carried out.

Some organisations use the sustainability risk prioritisation tool (Marrakech) and the DEFRA analysis tool to identify higher risk areas^x and to focus their risk prioritisation, which should not be far behind for those that identify areas of high risk. [St Mary's University, Twickenham](#) statement states that they identified construction/building works, catering supplies and ICT equipment as high priority, and produced a briefing which explained potential risks of modern slavery within these supply chains so that the procurement process has a particular focus on these areas.

The [University College London](#) also previously utilised the DEFRA Prioritisation Exercise, which evaluated their purchasing categories against social risks adapted from the Ethical Trading Initiative (ETI) Base Code.^{xi} This generated a risk score “from 1 to 5 for each spend category. The statement provides a list of the high risk categories (at level 4 and 5). This, the statement provides, allows for prioritisation of resources for the highest risk areas. The University states that it has created action plans for each category to understand and tackle risks.

A different approach to risk identification that was found across several statements, focused on the risk to recruitment, students and, representatives and education

establishments in the first instance, rather than on the product and service areas as is commonly done.^{xii}

b) Engaging with bidders and suppliers in risk assessment and response

This section focuses on ways in which HEIs develop their due diligence measures through engaging bidders and suppliers. Engaging in communications with bidders and suppliers about anti-slavery measures is a prerequisite to effective due diligence as it allows institutions to engage directly with their supply chain.

Conversation with suppliers can be key in understanding and identifying risks that are present in that supply chain and enquire about the measures being undertaken by bidders and suppliers themselves. Monitoring due diligence measures may not be enough if there is no engagement.

Universities continue to utilise relevant due diligence methods such as inserting modern slavery related clauses to their Terms and Conditions and using questionnaires at the tender process. [University of Strathclyde](#) have “embedded [their] obligations under the Modern Slavery Act 2015 in the University’s Supplier Code of Conduct, which underpins all tendering activity” and states that “[o]rganisations that [they] contract with must agree to the Supplier Code of Conduct as part of the obligations within

that contract.

As usual, much of the initial engagement occurs at the tender stage. [University of Aberdeen](#) reports that “each regulated procurement process conducted by the University requires tenderers to disclose whether the bidder or any member of their organisation with decision making powers has been convicted in the last five years of any offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or under any provision referred to in the Schedule to that Act.”

Whilst [Glasgow Caledonian University](#)’s Invitation to Tender template “includes sustainable procurement statements which require contractors to ensure they comply with current legislation in relation to the Equality Act 2010, Minimum Wage Regulations, Working Time Regulations, Health & Safety at Work Act and Modern Slavery Act.”

[University of Bedfordshire](#) also reports that due diligence is completed during tender exercises and is then recorded on the University’s e-tendering system. [Cardiff Metropolitan University](#) uses the Selection Questionnaire to assess MSA 2015 compliance, for suppliers both above and below the procurement thresholds. Furthermore, [Cardiff Metropolitan University](#) reports that the procurement team asks further questions the bidder’s company and internal policies and supply chain management at the award stage.

[University of Northampton](#) reports that during 2021/2022, they will continue to seek assurances from its supply chain via a Supplier Self-Assessment.

As such, much of the tender process remains a self-certification exercise, and [Durham University](#) takes a step further by engaging in an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery and human trafficking.

In its statement, the [University of Nottingham](#) provides that it has utilised an “enhanced set of tender questions” for their “£28m Lab Consumables tender to set up [their] own framework in consultation with experts in the Rights Lab.” The statement goes on to explain that these “questions were then scored by Procurement in conjunction with the subject matter experts in the Rights Lab to ensure all suppliers awarded a place on the framework were being proactive in their efforts to identify and action any cases of modern slavery and mitigate future risk.”

As part of their procurement process, [University of Dundee](#) also carry out due diligence on new suppliers. They ask “bidders and new suppliers to accept the Sustain Supply Chain Code of Conduct and, if the contract value exceeds £50,000, also require bidders to complete a Single Procurement Document which contains specific disclosure requirements in relation to slavery and human trafficking. Using these documents allows us to ensure that

our suppliers acknowledge and comply with our values.” [Robert Gordon University](#) also uses a Single Procurement Document.

A number of HEIs still refer to a ‘zero tolerance policy’ in relation to modern slavery and human trafficking. This includes the [University of St Andrews](#) whose statement states that they are “committed to conducting all business dealings and relationships in an ethical and transparent manner”. [Queen’s University Belfast](#) also adopt a zero-tolerance approach and state they “ensure all those in [their] supply chain [...] comply with [their] values”. This alone, however, is not sufficient and shows no due diligence steps being undertaken.

Communication and engagement need to be at the core of due diligence. For instance, [Heriot-Watt University](#) reports that the Procurement Services team “participate in training events, engage with the sector at conferences and briefings and attend webinars to increase awareness and understanding of Modern Slavery and Human Trafficking” and the university continues “to share and communicate knowledge and risks to relevant stakeholders and devolved buyers across the University.”

[Wrexham University](#) reports it has adapted the method employed by HEPCW – it has sent the same Modern Slavery survey to its current suppliers as part of their engagement.

[University of Central Lancashire](#) communicated with their suppliers directly and have “initiated discussions with a number of suppliers to ask about impacts arising from their business activities, including slavery within their supply chains, and providing an opportunity for them to tell [the university] how they are addressing these issues.”

[University of Surrey](#) reports it will be meeting with their largest IT hardware provider to gain assurance on how modern slavery is prevented in their supply chain.

‘Supplier Review Meetings (SRM)’ are conducted monthly, bi-monthly or quarterly at [Coventry University](#), allowing the procurement team discuss supply chain activity and MSA 2015 compliance with suppliers.

[University for the Creative Arts](#) reports that all suppliers have been emailed to remind them of their responsibility with reference to modern slavery and human trafficking.

Some institutions are utilising toolkits and systems in order to enhance their due diligence and supplier engagement. A significant number report using the NETpositive Futures Supplier Engagement Tool available to HEIs. This is the preferred tool for many institutions, and has been utilised by them in risk assessment, due diligence, monitoring and engagement. Particularly, institutions can use this to engage with suppliers, and some report

using it to create and monitor supplier action plans.^{xiii}

[University College London](#) reports also indirectly utilising the SEDEX supply chain tool by requesting and reviewing sample factory reports from their suppliers who use the SEDEX tool.

The [University of Glasgow](#) in turn uses a EcoVadis to collaborate with their suppliers on sustainability and Corporate Social Responsibility (CSR). In their modern slavery statement, the University describes how it uses EcoVadis, such as that it produces ratings and detailed scorecards on the supplier's CSR performance, stating that the "assessment is an evaluation on how well a company has integrated the principles of Corporate Social Responsibility into their business and management system".

[Robert Gordon University](#) has turned to using Sustain, the "APUC web-based assessment tool which links to the contracts database containing contracts/agreements used by the whole sector." It explains that the "website assesses suppliers at three achievement/compliance levels in social, ethical, economic and environmental areas."

[Staffordshire University](#) also reports that they launched a supplier development toolkit in 2019 to support suppliers on sustainability issues, including modern slavery.

[Edge Hill University](#) has, instead of using a toolkit, turned to practical steps of engaging in audits. Their Modern Slavery Statement reports that "[s]ince December 2019, [they] have also been completing 3 monthly Modern Slavery audits around the campus" which "involves approaching all contractors and agency staff on site, requesting their name, company name and purpose of their visit" and "have challenged over 74 contractors and agency staff to date."

BetterWork and Know the Chain are also used and relied upon by institutions.^{xiv}

[Loughborough University](#) also reports using those toolkits to check the performance of their suppliers in protecting their workers' rights. They engaged BetterWork for their apparel contracts and Know the Chain for their IT contracts.

A unique approach is presented by the [London School of Hygiene and Tropical Medicine](#) which carries out "internal due diligence on research partners" as part of their obligations under the MSA 2015.

Institutions are also engaged in ensuring that due diligence measures are continuously developed. Such as [University of Leicester](#) which report that their Director of Procurement, along with his counterpart at De Montfort University, "lobbied the Home Office to use the Government's weight and resource to ensure more practical steps are taken to mitigate the risk of slavery and human trafficking in public/HE sector supply chains" suggesting "that the Crown

Commercial Service could do more in auditing the supply chains that feed its high risk framework agreements, used across the public/HE sector.”

Some Universities report that they would exclude any supplier which has been convicted of modern slavery or human trafficking offences,^{xv} or that they reserve the right to put a stop any supplier that fails to provide evidence of taking appropriate steps and measures to ensure the prevention of modern slavery and human trafficking.^{xvi}

c) Collaboration

Modern slavery and human rights abuse in supply chains cannot be addressed by a single organisation. It is a global challenge, requiring both global and local action and the involvement of many entities. Furthermore, partnerships promote knowledge and the sharing of best practice, as well as allowing for a more efficient resource management.

Most, verging on all, HEIs statements analysed, referred to some form of collaboration. This is most often their membership of and collaboration with purchasing consortia.

Purchasing consortia play a significant role in the sector and it is relevant that HEIs mention their engagement with them. However, this should not detract on the explanation of their own actions and how they implement the tools that consortia

provide to develop their own modern slavery due diligence. [Harper Adams University](#), which has a very good quality statement notes that “[e]ffectively the University will be delegating its modern slavery supplier due diligence to the consortia for these products.”

The other form of collaboration most often mentioned was the institutions membership and/or affiliation with Electronics Watch. This again, varied across statement from brief mentions to explanations of how the institution is associated with Electronic Watch. [University of Aberdeen](#) highlights that it one of the founding members of Electronics Watch. Other statements also make the distinction whether the institution is a member of Electronics Watch or an affiliate member though by virtue of their membership to a purchasing consortium who is an Electronics Watch affiliate.

In depth partnerships do not appear to be at a forefront of the anti-slavery efforts of universities. References to Working Groups which were set up or joined by some institutions, provide the best example of close and in-depth collaboration taking place in the higher education sector. For instance, the [Royal Veterinary College](#) statement explored the “COVID Working Group [which] was set up to review arrangements with external education partners”. The statement reflect that the groups “work has proved beneficial” and it has “been agreed to formalise the group to continue its work in assessing and

improving arrangements for collaborative provision”.

However, in this case, and in the case of a number of other statements which referred to working groups, there is general lack of information about the type of discussions they engage in, and oftentimes, it is not clear whether the working group is specialised in modern slavery or who its members are.

University of Gloucestershire statement notes that the University “is an active member of The Gloucestershire Anti-Slavery Partnership and a number of our staff team members have received online updates aimed at raising awareness of the risks of modern slavery in the local community”, so whilst the working group has a modern slavery specialisation, the statement does not make clear who are the other members of the partnership.

Manchester Metropolitan University makes references to its academic partnerships with universities, colleges and academies from around the world and states that it is “committed to ensuring that [their] expectations around Modern Slavery in [their] UK business is reflected in [their] international partnerships.”

Another type of collaboration engaged with is on training, whereby the institution rely on and collaboratively engage with external partners to provide modern slavery training to their staff. This is discussed further under ‘Training’ below.

d) Measuring effectiveness

Effectiveness continues to be by far the least reported on section. Particularly caused by a lack of understanding about this section, statements often refer to goals and future aims. Occasionally, under the effectiveness heading, the statement does not provide any effectiveness analysis but sets out due diligence measures, and there are no Key Performance Indicators (KPIs).^{xvii}

The government Guide encourages organisations to report on the effectiveness of their measures by providing information on existing or additional KPIs related to anti-slavery measures.

KPIs are tools to measure effectiveness of due diligence, but not due diligence measures in themselves and should not therefore substitute having appropriate strategies to prevent and respond to modern slavery. KPIs should allow for the tracking of progress in short, medium and long term and allow for substantive measurement of effectiveness of processes and practices. In order for KPIs to be a good tool to measure effectiveness of the steps taken by an institution to ensure that modern slavery and/or human trafficking is not taking place within their business or supply chains, they need to be rigorously measured and reported upon.

Reporting under this section ranges from statement indicating that the university ‘review effectiveness’, such as found in

Bournemouth University's statement.^{xviii}

Under effectiveness, Arts University Bournemouth discusses only that they will “monitor, record and benchmark the extent to which activities may be deemed to be in contravention of the Modern Slavery Act 2015 either in the employment of staff or the procurement of goods and services from suppliers”

Other institutions explore their measure and effectiveness in unquantifiable ways. Such as University of Gloucestershire who engaged an audit, and the statement provides that “the University’s internal auditors (RSM UK Consulting LLP) conducted a high-level advisory review of the framework for compliance with legal and regulatory requirements in relation to modern slavery” and “found reasonable assurance that the controls upon which the organisation relies to manage this area are suitably designed and consistently applied”.

In a different approach, Anglia Ruskin University, among other, sets goals for the next financial year for supplier engagement. The statement states that the University plans to:

- “Target [...] activities to those suppliers and supply chains who are either not aware that Modern Slavery is an issue for their business or are not taking a proactive approach [...].
- Engage with suppliers not utilising

the tool.

- Meet with a number of high-risk category suppliers to understand their supply chain further.
- Report annually on noncompliance [...].
- Amend due diligence process for potential new suppliers and do a communication program with current supplier’s awareness and confirmation of compliance, awareness of Modern Slavery act.”

University of Ulster has also not developed any KPIs as such but does keep track of the steps undertaken since the previous statement allowing the University, and the stakeholders reviewing the statement, to understand the progress and development made in that period.

The statement for Newcastle University, goes further and, under the KPIs heading, discusses their goals and whether they have been achieved, and if not why. However, the goals were also non-measurable one-off actions.

Similarly, Glasgow Caledonian University (CGU) begins to assess its undertakings which begin to read like quantifiable KPIs. The statement provides that:

- “During the academic year GCU have let 17 new contracts, with 14 suppliers, who have committed to the Sustain Supply Chain Code of

Conduct [...]

- During the academic year GCU have let 20 new contracts, with 14 suppliers, who have committed to paying the Living Wage.”

[Cardiff University](#) statement provides that KPIs have been developed for use in high risk category areas, but none are listed in the statement, nor does the statement provide where those can be found.

[University of the West of England](#) mentions one KPI, related to training, stating that the University is “progressing at 100% completion rate for staff with purchasing authority to undertake [online] training.” Whilst [University of Derby](#) statement states that effectiveness “will be measured by monitoring how many staff have registered and viewed the Modern Slavery video or completed the e-learning course” and that they “will measure how many additional suppliers register an action plan to combat Modern Slavery on NETpositive”.

Fully fledged KPIs were listed by [University of Chester](#), which listed the following KPIs that are used to measure effectiveness:

- Staff training levels
- Actions taken to strengthen supply chain auditing and verification
- Steps taken to raise awareness of modern slavery and human trafficking amongst employees and students;
- Investigations undertaken into

reports of modern slavery and any action taken in response;

- Involvement in modern slavery and human trafficking prevention initiatives, research, partnership and collaborations aimed at tackling modern slavery and the promotion of a shared culture of best practice.

[University of Edinburgh](#) statement also sets out extensive KPIs, as reproduced below.

Lastly, [Edge Hill University](#) relied on NetPositives data and showed how it allows them to ascertain percentages of engagement. The same approach was taken by [Manchester Metropolitan University](#), particularly through monitoring supplier use of Action Plans, which are then used as a KPI measure. Thus, [Manchester Metropolitan University](#) uses the following KPIs:

- how many suppliers have made a public commitment to tackle Modern Slavery (93%).
- how many suppliers who are required a Modern Slavery Statement recognise Modern Slavery as an Issue in their business (85%).

University of Edinburgh Statement

Key performance indicator	2020/21 measure
# of contracts that are issued on University standard terms and conditions that include modern slavery compliance provisions	All purchase contracts now include modern slavery requirements.
# suppliers engaged with directly on modern slavery (email, phone, or face to face)	All suppliers engaged indirectly through new terms and conditions and self-declaration requirement.
# suppliers providing information on modern slavery efforts on Sustain supplier database	This indicator will be updated in 21/22 as we switch to implement the EcoVadis tool
# known reported modern slavery cases in our direct areas of influence	0
# reported cases resolved	-
# staff trained on modern slavery risks and best practice (online or face to face courses) Target = 1,000	c250 staff (tbc) have taken in-house online training on modern slavery All MCIPs professionals in the Procurement Office are required to complete Ethical Procurement Training every year to maintain their chartered membership. c50 students have completed online training 36 students have completed online training (to date, up to July 2020).
Reaching staff, students and the wider community: # event attendees and online page views related to modern slavery	14,400 (estimated)
Collaborations with others	We have collaborated with Electronics Watch, APUC, Environmental Association for Universities and Colleges (EAUC), National Union of Students (NUS), Higher Education Procurement Association (HEPA), and the Scottish Government.

4. Training on slavery and human trafficking available to staff

Our analysis shows there is variety with the approaches undertaken by various institutions when it comes to engaging in, and reporting on, training.

One of the core distinctions in how institutions employ training is whether it is internal or external.^{xix} Internal training includes internal resources managed by

the institution often taking on the form of an induction^{xx} and refresh training. External training, as the name implies, is supplied by external actors.

Training can take place online, especially during the Covid period, as indicated by [University of Aberdeen](#), or be carried out face-to-face, as by [Edinburgh Napier University](#). Different resources are also used to provide training. [Queen Margaret University](#) utilises self-guided training modules. A web resource was developed for [Queen Mary, University of London](#) staff “to provide guidance for staff on the implications of the Modern Slavery Act,

their responsibilities in regard to it, and the routes to escalate concerns or issues they may have about a situation or supplier”.

Training that is reported on can also be modern slavery based, or less direct such as that provided by [BPP University](#) which says it trains all new employees on values included in Code of Business Ethics. As identified in our previous report, some training cited do not refer to modern slavery and human trafficking and solely focus on institutional policies which is not adequate for the purposes of a modern slavery statement.

a) Type of Training

Training can start from a modern slavery awareness standpoint but should develop into a more in-depth endeavour for relevant staff. Most analysed statements still emphasise awareness training over in-depth modern slavery training.

[University of Edinburgh](#) promotes their ‘Modern Slavery Awareness’ online training course to staff and students. The modern slavery statement reports that the “course aims to raise awareness about what modern slavery is and how to prevent it”, and it is mandatory for all staff members with authority to approve financial transactions. Similarly, [University of Glasgow](#) requires its procurement team to undergo ‘Sustainable Procurement’ training, however, the statement does not clarify, how, if at all, it touches upon modern

slavery risks specifically.

[University of the West of Scotland](#) also aims to raise awareness by circulating their modern slavery statement twice a year.

[University of Manchester](#) has a regular refresh on material incorporated into their annual risk and compliance training programme and offer a general training, available through the staff sustainability engagement programme: ‘10,000 Actions’ which includes a module on Responsible Procurement with material on modern slavery.

[Queen Mary, University of London](#) statement reports that training covers the following modules: Guide to Modern Slavery; Protecting Human Rights in the Supply Chain; Introduction to HE Procurement; and Introduction to Sustainable Procurement.

b) External Training Providers

External actors who provide modern slavery training include the various purchasing consortia. For instance, APUC provides Sustainable Procurement training, which was undertaken by staff from the [University of Strathclyde](#).

HEPA, the Higher Education Procurement Association, also provides extensive procurement training to many institutions. For instance, the [University of Dundee](#) employs the ‘Intro to Sustainable Procurement’ e-learning module from

HEPA. HEPA training is also used by [Robert Gordon University](#).

Norfolk Anti-Slavery Network and Stronger2gether.org provides training for the procurement team at [University of East Anglia](#), whilst [Institute of Cancer Research](#) received training delivered by Business, Human Rights and the Environment Research Group (BHRE) for HEPA. The statement went on to state that “80% of Facilities Services staff successfully completed an Environmental Sustainability Skills for the Workforce course which covered the modern slavery act [sic]”.

Our analysis has also revealed an emphasis on CIPS qualified procurement staff. Highlighted by the modern slavery statement of [University of Leeds](#), it provides that to “further enhance [their] understanding of modern slavery and human trafficking risks, all category team members are either working towards, or are CIPS-qualified”. Similarly, [University of the Highlands and Islands](#) statement reported that the procurement team will complete CIPS on-line training module “Ethical Procurement and Supply” on an annual basis. CIPS training is annual at the [University of Bath](#).

The modern slavery statement of [Sheffield Hallam University](#) boasts that all procurement staff are MCIPS qualified.

British Universities Finance Directors Group (BUFDG) have also provided a e-learning module that is utilised by a number

of institutions, such as [University of the Arts London](#), [University of Leicester](#) and [Teesside University](#).

[Queen’s University Belfast](#) have received awareness training delivered by the charity Unseen and make it available as part of the Finance Training Programme.

At [Sheffield Hallam University](#) staff members who engage in high volume/value transactions are required to access the Government Commercial College case study on tackling modern slavery in supply chains.

Glen Cleaning Group, who provide cleaning services at [Cardiff Metropolitan University](#), developed and shared their “in-house” video training for the University staff.

Lastly, [University of Strathclyde](#) links to the [Scottish Government human trafficking training](#) available via their website.

c) Who receives training?

Another point of difference at many institutions, is who receives training. Many universities continue to fail in specifying who encompasses relevant staff, as identified in our previous report. The Government Guidance states that organisations should think about where training should be targeted to have the most effect.

[University of Hull](#) states it provided training to “key members of staff, particularly within

the procurement function” and states that training is mandatory for “all employees who procure goods and services on behalf of the University”.

[University of Chichester](#) made their e-learning module available to all staff, however. Whilst at [University of Cumbria](#) training is for targeted staff including contract managers and HR staff.

5. Purchasing Consortia

The majority of universities purchasing consortia have their own Slavery and Human Trafficking Statements. These are: [AUPC](#), [LUPC](#), [NEUPC](#), [NWUPC](#), and [SUPC](#), as well as [TUCO](#). Those serve as an added layer of risk assessment and supplier engagement from which universities can benefit.

The consortia have published thorough and detailed modern slavery statements which should, and oftentimes do, serve as inspiration to HEIs. However, as discussed above, institutions should avoid merely reiterating the contents of the consortia statements in their own MS statements. Instead, and if applicable, they should link their consortium statements and explain the impact it has had on their own activities.

BHRE reiterates the warnings against just relying on the consortia statements –or any others- as templates as each institution should be responsible for and show ownership of the process in producing its own statement.

About BHRE

The Business, Human Rights and Environment Research Group (BHRE) brings together the expertise and research interests of several leading academics in the field of Business and Human Rights, International Environmental Law and International Criminal Law. As part of our research we focus on the roles and responsibilities of public buyers regarding their own supply chains. In particular, we are studying the implementation of the Transparency in Supply Chains provision of the UK Modern Slavery Act 2015 (MSA) by the public sector. We are also supporting initiatives to amend the law to include obligations for public authorities to report on their efforts to identify, prevent and mitigate modern slavery, and to increase accountability for human rights violations in global supply chains.

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Professor Martin-Ortega is a member of the Board of Trustees of Electronics Watch and the Corporate Justice Coalition UK, as well as a member of the Board of Directors of the London Universities Purchasing Consortium. She also coordinates the International Learning Lab on Procurement and Human Rights. She has conducted numerous trainings for public authorities on their legal obligations under the UK Modern Slavery Act and performing human rights due diligence on their supply chain in the framework of the Higher Education Procurement Academy (HEPA) and advised the UK Home Office, the government of Canada, OSCE and United Nations on public procurement and human rights in global supply chains.

Anna Gorna consults the BHRE on projects related to modern slavery reporting, fair recruitment in public procurement and human rights due diligence. She graduated with a first-class degree in Law from the University of Greenwich in 2017 and completed the BPTC at BPP University in 2020. Anna worked as an intern at the BHRE in 2018 and in 2019 she worked at LUPC on responsible public procurement and developing the joint LUPC-BHRE project Equiano. She is currently a paralegal and aims to become a Barrister.

We are grateful for the funds and support from the London Universities Purchasing Consortium (LUPC) in the production of this report.

BHRE Resources for Public Buyers

TEDx Talk

[Changing the World one Tender at a Time](#) by Professor Olga Martin-Ortega (2022).

See as well, REF 2021 results feature at [LUPC Linked Magazine](#) (summer 2022).

Guidance

- Olga Martin-Ortega, Martina Trusgnach and Marisol Bernal (2021), [Preparing a Slavery and Human Trafficking Statement: Guidance for Higher Education and the wider Public Sector](#). BHRE Research Series. Policy Paper no. 6.
- Olga Martin-Ortega and Andy Davies (2019), [Modern Slavery Statement Checker. Points to check for when reviewing a supplier's modern slavery statement](#), CIPs Knowledge.
- Olga Martin-Ortega and Andy Davies (2017), [Protecting Human Rights in the Supply Chain. A Guide for Public Procurement Practitioners](#) (CIPS).
- LUPC-BHRE (2018), [Protecting Human Rights in the Supply Chain. Free E-Learning suite](#).

Research Reports and Policy Briefs

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- Olga Martin-Ortega and Anna Gorna (2020), [UK Modern Slavery Act Transparency in Supply Chains: Reporting by Local Authorities](#), BHRE Research Series. Report No. 4, September 2020
- Olga Martin-Ortega and Patrycja Krupinska (2018), [UK Modern Slavery Act 2015 Transparency in Supply Chains: The Second Year of Reporting by Universities](#). BHRE Research Series, Report no. 3. June 2018.
- Olga Martin-Ortega, Anna Gorna and Rahima Islam (2018), [UK Modern Slavery Act Transparency in Supply Chains: Reporting by Local Authorities](#). BHRE Research Series, Report no. 2. March 2018.
- Olga Martin-Ortega and Rahima Islam (2017), [UK Modern Slavery Act 2015 Transparency in Supply Chains: The First Year of Reporting by Universities](#), BHRE Research Series, Report 1.

For more information, visit www.bhre.org

Annex I: Modern Slavery Statements Analysed

- Abertay University
- Aberystwyth University
- AECC University College
- Anglia Ruskin University
- Arden University
- Arts University Bournemouth*
- Aston University
- Bangor University
- Bath Spa University
- Birkbeck, University of London
- Birmingham City University
- Bournemouth University
- BPP University*
- Brunel University London
- Buckinghamshire New University
- Canterbury Christ Church University*
- Cardiff Metropolitan University
- Cardiff University
- City, University of London
- Coventry University
- Cranfield University
- De Montfort University*
- Durham University
- Edge Hill University
- Edinburgh Napier University
- Falmouth University
- Glasgow Caledonian University
- Goldsmiths, University of London
- Harper Adams University*
- Hartpury University
- Heriot-Watt University
- Imperial College London
- Institute of Cancer Research
- Keele University
- King's College London
- Kingston University
- Lancaster University
- Leeds Beckett University
- Leeds Trinity University
- Liverpool Hope University*
- Liverpool John Moores University*
- London Business School
- London Metropolitan University*
- London School of Economics
- London School of Hygiene & Tropical Medicine
- London South Bank University
- Loughborough University
- Manchester Metropolitan University*
- Middlesex University
- Newcastle University
- North West Regional College
- Northumbria University
- Nottingham Trent University
- Open University
- Oxford Brookes University
- Plymouth University
- Plymouth Marjon University (University of St Mark & St John)
- Queen Margaret University*
- Queen Mary, University of London
- Queen's University Belfast
- Regent's University London
- Robert Gordon University
- Roehampton University
- Royal Academy of Music
- Royal Holloway, University of London
- Royal Veterinary College
- School of Oriental and African Studies
- Sheffield Hallam University
- Southampton Solent University
- St George's, University of London
- St Mary's University, Twickenham
- Staffordshire University
- Swansea University
- Teesside University*
- Ulster University
- University College Birmingham
- University College London*
- University for the Creative Arts
- University of Aberdeen
- University of Bath
- University of Bedfordshire
- University of Birmingham
- University of Bolton*
- University of Bradford
- University of Bristol*
- University of Buckingham
- University of Cambridge*
- University of Central Lancashire
- University of Chester
- University of Chichester*
- University of Cumbria*
- University of Derby*
- University of Dundee

- University of East Anglia
- University of East London
- University of Edinburgh
- University of Essex
- University of Exeter
- University of Glasgow
- University of Gloucestershire*
- University of Greenwich*
- University of Hertfordshire
- University of Huddersfield
- University of Hull
- University of Kent
- University of Law
- University of Leeds
- University of Leicester
- University of Lincoln*
- University of Liverpool
- University of London
- University of Manchester*
- University of Northampton
- University of Nottingham*
- University of Oxford
- University of Portsmouth
- University of Reading
- University of Salford
- University of Sheffield
- University of South Wales*
- University of Southampton
- University of St Andrews
- University of Stirling
- University of Strathclyde*
- University of Suffolk*
- University of Sunderland
- University of Surrey
- University of Sussex
- University of the Arts London
- University of the Highlands and Islands
- University of the West of England*
- University of the West of Scotland
- University of Wales Trinity Saint David
- University of Warwick
- University of West London
- University of Westminster
- University of Winchester
- University of Wolverhampton
- University of Worcester
- University of York
- Wrexham Glyndŵr University
- York St John University*

* Statement included in the Modern Slavery Statement Registry

Annex II: Transparency in Supply Chains Reporting Dos and Don't's¹

MANDATORY (FORMAL) REQUIREMENTS	
DO	DON'T
Publication and Accessibility	
Report annually on the past financial year within six months of your organisation's financial year-end	Report either in advance of the end of a financial year or after six months of your organisation's financial year
Improve the statement year on year - it is a live document	Reproduce your old statement with minor word changes or merely altered dates
Keep a record of old statements accessible to the public (providing URL links etc). This allows for progress to be monitored	Delete old statements, only have the current statement publicly available
Publish the statement in a prominent place on your website, e.g. bottom of homepage or obvious drop-down menu	Publish it in a place difficult to find or password protected
Formulation and Approval Process	
Ensure the statement is approved at the highest level and signed by a senior member of the organisation; providing their post and name, signature and approval date	Leave the statement unsigned/dated or in draft format; simply state it has been approved without specifying
Ensure the statement is a genuine reflection of your business, practices, and culture	Use templates without making the statement your own
Formulate the statement as a collaboration between departments, with procurement teams leading and others participating eg human resources, legal and safeguarding teams	Leave it to one department or person to write the statement without input and contribution of others
Provide relevant information in your statement with sufficient detail	Use the statement to showcase non-Modern Slavery and human rights related activities and overwhelm the reader with excessive details, ie too much legal or technical information

¹ Adapted and updated from the Modern Slavery: Transparency in supply chains statements, Aide Memoire, BHRE created for the Local Government Association available [here](#).

SUBSTANTIVE CONTENT OF STATEMENTS	
DO	DON'T
Organisational Policies	
Showcase your Modern Slavery policy if you have it and explain the link between your existing policies and Modern Slavery	List or reproduce all of your organisational policies
Amend existing policies to include references to Modern Slavery or create a standalone Modern Slavery policy	Refer to policies that have no relation to Modern Slavery
If approving a standalone Modern Slavery policy, clearly set out the obligations on staff, suppliers, business partners and agents, as well as procedures to be followed	Create a Modern Slavery policy composed of a collection of empty statements with no clear impact on your HEI's work and behaviour e.g. merely referring to a zero tolerance approach is not enough
Clearly state who is responsible for the implementation of the relevant policies, how implementation will be monitored and how it should be reported on	Publish a policy without a responsible department/person and an enforcement, reporting and review mechanism
Circulate policies in your organisation and relevant parties to make it known to all and explain how this is done in the statement	Have policies your staff, constituents and customers, business partners, suppliers and other stakeholders don't know about and wouldn't be able to find unaided
Due Diligence: Identifying and Prioritising Risks	
Show you understand the risks of abuse your organisation and practices pose: <ul style="list-style-type: none"> • towards your own staff • related to recruitment practices (including use of agencies) • related to sub-contracting • related to the products/services you procure • in your supply chains. 	Reproduce the risks found in other statements or templates without assessing how they relate to your own practice and suppliers
Consider risks associated by country; sector; transaction; and business partnerships as set out in Tackling Modern Slavery in Government Supply Chains Guide for Commercial & Procurement Professionals	State that procuring solely from the UK means your supply chains are at a low or no risk of Modern Slavery. Modern Slavery is occurring every day in public sector supply chains in the UK
Highlight your high-risk areas, whether product or service based, in your supply chain	Merely list all products or services procured
Prioritise risks and focus on high-risk supply chain mapping	Try to map all of the supply chain at once
Understand that risks may change	Reproduce the same risks year on year in your statement

MANDATORY (FORMAL) REQUIREMENTS	
DO	DON'T
Due Diligence: Preventing, Mitigating and Remediating Abuses	
<p>Ensure that you have functioning and responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within domestic and global supply chains. For example:</p> <ul style="list-style-type: none"> • referrals, site visits and spot checks • contractual provisions and contract monitoring and management • asking for suppliers to provide their own due diligence of their sub-contractors and supply chains • use online modern slavery risk identification and management tool such as the government's Modern Slavery Assessment Tool (MSAT) 	<p>Do not make vague and generalised declarations stating that you take all appropriate measures without providing details</p>
<p>Seek assurances from suppliers during the tendering process. Ask the questions up front and probe responses, where appropriate Pre-procurement specification, questionnaires and checklists can be found in Tackling Modern Slavery in Government Supply Chains</p>	<p>Solely rely on a checklist and allow this to become a tick box exercise</p>
<p>Introduce Modern Slavery related clauses into contracts and terms and conditions and use them to engage with suppliers meaningfully, making your expectations clear</p>	<p>Simply inform suppliers of your policies or ask them for theirs and seek vague anti-slavery assurances</p>
<p>Work with suppliers to create action plans, take corrective measures, and if suppliers refuse to cooperate, consider measures against them</p>	<p>Immediately terminate the business relationship</p>
<p>When contracting services robustly question recruitment processes</p>	<p>Use minimal vetting techniques, or state that you use 'reputable recruitment agencies' which you have not assessed</p>
<p>Report on planned monitoring and auditing measures for your own sites and sites of your suppliers</p>	<p>Outsource the responsibility to your suppliers, merely assuming they will carry out adequate monitoring</p>
<p>When using third party audits engage in the process and create action plans</p>	<p>Rely on the audit without a follow-up</p>
<p>Identify and report violations, and address how you will mitigate them</p>	<p>Hide or dismiss violations or rely on suppliers to resolve them when they take place lower down in your supply chain</p>

MANDATORY (FORMAL) REQUIREMENTS	
DO	DON'T
Establish Modern Slavery working groups internally in which relevant departments are involved to address instances where you have identified risks or actual abuse	Make due diligence the responsibility of one sole individual or department in the institution – it is an organisation wide process.
Review these procedures annually and continuously seek to innovate and improve on these over time	Be complacent that current due diligence practices will always mitigate the risk of Modern Slavery in your supply chains - unscrupulous suppliers will always be looking for new ways to exploit the situation
Collaborating with External Partners	
Provide details of your collaboration with external partners, including the measures taken	Sign up to partnerships or collaborations, expecting for them to resolve the problem for you
Collaborate within your sector and share good practice	Treat the statement as a competition or a trade secret
Seek to collaborate with organisations working in different sectors that can help you manage modern slavery risks – for example Electronics Watch4who provides intelligence, collaboration and support about working conditions in factories that assemble IC.	Think you can combat Modern Slavery on your own, pooling resources and intelligence will often be required.
Measuring Effectiveness and Planning for the Future	
Report on how you will measure effectiveness and who is responsible for this measurement	State the procedures have been reviewed without indicating the assessment and impact they had
Provide information on existing Key Performance Indicators (KPIs)	Make vague and general commitments for the coming years
Ensure KPIs are Modern Slavery related, including responsible procurement KPIs	List commitments which are not directly relevant
Track progress at short, medium and long term, and allow for substantive measurement	Fail to assess and report on the effectiveness of measures undertaken
Review your aims, goals and KPIs annually, with distinct future goals	Reproduce the same KPIs year on year without measuring their effectiveness
Be honest, if you've not had much success, it's fine to be upfront about this whilst striving to improve in the future	Be afraid of publishing a lack of progress or hide setbacks

MANDATORY (FORMAL) REQUIREMENTS	
DO	DON'T
Training and Capacitation	
Provide Modern Slavery specific training which is relevant to your organisation	Cite training unrelated to Modern Slavery in your statement or provide training which is not relevant to your work
Provide training to all staff, including refreshers and new courses	Reduce Modern Slavery training to induction processes for new staff
Provide targeted Modern Slavery supply chain and contract management training for relevant staff, especially to procurement teams, contract managers, trading standards, compliance, legal and finance teams	Use a one fits all approach
Use external and internal training	Outsource all training responsibilities to consultants

NOTES

ⁱ [Bournemouth University](#).

ⁱⁱ [London Business School](#) .

ⁱⁱⁱ Such as a Director of Human Resources who signed on behalf of [Birmingham City University](#), a Finance Director who signed on behalf of the [University of Warwick](#), or even an Interim Chief Financial Officer who signed on behalf of [University of Plymouth](#).

^{iv} For example: [University of Wolverhampton](#) or [University of Westminster](#), among many others.

^v Such as the statement for [Middlesex University London](#) and [Coventry University](#), respectively.

^{vi} See for example [Bournemouth University](#).

^{vii} For instance, we have previously identified the statement of the [University of Dundee](#) as an example of good practice when it came to reporting on organisational structure and supply chains, but the current iteration of the statement does not address this at all anymore. Similarly, [Birkbeck University of London](#) was used as an example of good practice on recognising first tier suppliers – they have now removed any references to this from their current statement.

^{viii} As was noted in the statement of the [University of Bedfordshire](#) or the [Canterbury Christ Church University](#).

^{ix} [University of Edinburgh](#); [Arden University](#); [University of Cambridge](#); [University of Chichester](#); [University of Greenwich](#); [University of Hull](#); [University of Law](#); [London Metropolitan University](#); [Oxford Brookes University](#); [University of Suffolk](#); [University of Surrey](#).

^x Such as [University of Glasgow](#).

^{xi} The University's Modern Slavery Statement also indicated that this has now been archived.

^{xii} This includes [Teesside University](#), [Royal Academy of Music](#) and [University of Gloucestershire](#).

^{xiii} Such as [University College London](#).

^{xiv} See [University of Leicester](#).

^{xv} See [Queen Margaret University Statement](#) and [University of Aberdeen Statement](#).

^{xvi} See [University of Bolton Statement](#).

^{xvii} [Birmingham City University](#), is one such example.

^{xviii} Also, in [University of the West of Scotland Statement](#)

^{xix} Such as identified by [Bournemouth University](#), which offers both internal and external training.

^{xx} [Ulster University](#) provides that creating awareness of modern slavery and human trafficking issues will form part of staff induction and training sessions.