Modern Slavery and Human Trafficking Statement
2019-20 Financial Year

The University is committed to ensuring that slavery and human trafficking is not taking place in its supply chain, in line with the Modern Slavery Act 2015. As the University is a values-based institution, it condemns morally bad practices and expects all of its business partners to live up to and adhere to the principles set out in the anti-slavery legislation. The actions taken by the University in this financial year to meet the objectives include:

- Oversight of the management of risks of modern slavery and human trafficking in the supply chain is provided by a nominated senior manager, the Pro Vice Chancellor (Research and Enterprise), as part of his role of chair of the Sustainability Strategic Management Group.

- A policy review is continuing, and where required, modifications are being made to ensure that all relevant University policies identify how they support compliance with the Modern Slavery Act.

- In December 2019 the Research and Enterprise Integrity Framework was updated and approved to include an ethical statement to confirm: The University will not engage in research or enterprise where such interaction is considered unethical and might conflict or be inconsistent with the values, aims, objectives and/or activities of the University. This includes, but is not limited to, ensuring it supports the aims of modern slavery act to abolish the use of forced labour and to discourage human trafficking.

- As part of the due diligence checks for all significant tender exercises a statement is obtained from the supplier confirming how they meet the requirements of the Modern Slavery Act 2015. If the goods or services being purchased have a high risk of labour rights violations (including but not limited to: clothing; IT equipment, and construction works) then additional questions to demonstrate compliance are raised as part of the tender process.

- The increased risk of Modern Slavery in the supply chain due to COVID 19 restrictions and the need to monitor health and safety in working practices for social distancing has highlighted the importance of due diligence checks of suppliers. The procurement team and purchasing managers across the institution recognise the heightened risk and are completing thorough checks at the tender stage, prior to taking on any new suppliers, to help mitigate the risk.

- In support of these mitigating actions, the University’s Procurement team offers support and guidance to all areas of the University that engage with suppliers to procure goods and services, reporting any non-compliance of policy requirements to the relevant Senior Manager.

- The University’s Governance and Legal Services team reviews contractual terms and conditions of all draft agreements to ensure provision is made relating to Modern Slavery
• The University’s Chaplains work closely with the Salvation Army to help identify and support people to bring them out of human trafficking and the modern day slave trade.
• To raise awareness of the prevalence of Modern Slavery in Kent members of Staff and Students of the University came together to form a human chain around Augustine House.
• The University’s Modern Slavery and Human Trafficking Statement has support of the full Governing Body, and was presented for approval at the Governing Body meeting on 24 November 2020.

The Unitemps temporary staffing agency operates under franchise by the University’s subsidiary. The agency falls outside of the scope of the modern slavery legislation, but on a voluntary basis the agency complies with the requirements of the Modern Slavery Act. The actions taken by the agency are monitored by the Branch Manager, and include:

• Client terms of engagement require the client to comply with the requirements of the Modern Slavery Act.
• All external clients must comply with all applicable anti-slavery, forced and compulsory labour, and human trafficking laws, statutes and regulations in force.
• External clients must have and maintain their own policies and procedures to ensure compliance. These policies must give the client the power to enforce the conditions where appropriate.
• The high risk areas for agency staff have been identified as being where a gang master’s license is required, such as in agriculture. No Unitemps agency workers can be set assignments in these high risk sectors.

The University continues to expand its knowledge of the supply chain and works proactively with all managers, budget holders and staff engaged in procurement activity to build on their understanding of the requirements of the Modern Slavery Act. This forms part of the University ongoing commitment to ensuring all vulnerable staff, students and those working in the supply chain are safeguarded against exploitation in all forms.

Approved and signed on 24 November 2020 by:

Professor Rama Thirunamachandran
Vice Chancellor