

# Modern Slavery and Human Trafficking Statement 2023-24

The University is committed to ensuring that slavery and human trafficking is not occurring in its supply chain, in line with the Modern Slavery Act 2015. As a values-based institution, the University condemns any form of labour exploitation or human trafficking and expects all its suppliers and business partners to adhere to the principles set out in the Modern Slavery Act. Oversight of the management of risks of modern slavery and human trafficking in the supply chain is provided by a nominated senior manager, the Chief Finance and Operating Officer. The University's Modern Slavery and Human Trafficking Statement has the support of the full Governing Body and was approved by the Governing Body at its meeting on 26th November 2024.

Actions taken by the University in this financial year to meet its obligations include:

### **Procurement Activity**

In the 2023-24 financial year the University has awarded twelve major supply contracts, three of which were deemed to be potentially those that may be at high risk of modern slavery activities. All successful suppliers were asked to confirm that they had arrangements in place to manage the risk of slavery in their supply chain. The University is further developing its processes in 2024/25 to ensure that bidders for such contracts will be required to complete a further in-depth assessment of the checks that they have in place to detect cases of modern slavery and forced labour.

# **Sustainability Tool**

This year the University has implemented a new supply chain sustainability monitoring tool. This will allow for the monitoring of the sustainability impacts of University suppliers which have registered, including modern slavery risks. This is an important development as it provides a more systematic approach to supply chain monitoring and management and facilitates collaboration across the higher education sector.

In the first year of operation, the tool has enabled the 134 suppliers who have self-certified that they are a supplier to CCCU with the following outcomes:

- 60 are legally obliged to publish a modern slavery statement and have done so
- 2 are legally obliged to publish a modern slavery statement and have not yet done so
- 36 are not obliged to publish a modern slavery statement but have done so anyway
- 36 are not obliged to publish a statement and have not done so

The tool also captures information about incidents of modern slavery, staff training, risk analysis and reporting mechanisms. This data will be used to increase the number of suppliers that use the tool (prioritising suppliers of high-risk goods or services) and to encourage companies to improve their arrangements for managing modern slavery risks.

## **Operational Control Procedure**

As part of its Environmental Management System (EMS) the University maintains a series of 'operational control procedures' that document the steps taken to ensure that the institution's sustainability obligations are appropriately managed. The previous arrangements which involved two separate procedures for the management of modern slavery risks and sustainable procurement have now been combined which has enabled more effective processes for the embedding of modern slavery checks within the procurement supply chain.

### **Procurement Partners**

The University uses pre-negotiated 'framework agreements' to award many of its contracts. Most of these are awarded and managed by the Southern Universities Purchasing Consortium (SUPC) which embeds responsible procurement into all of its activities.

Suppliers in higher-risk spend categories are asked by SUPC to commit to the Base Code of the Ethical Trading Initiative (ETI). SUPC will work to persuade suppliers in high-risk spend categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

SUPC (and other regional universities purchasing consortia with whom we work) are also affiliated with the Electronic Watch to ensure compliance with labour rights and safety standards in the technology & computing supply chain. This is particularly relevant for the supply of IT equipment which is classed as a high-risk industry.

SUPC is committed to acquiring goods and services for its members without causing harm to others. Affiliating with Electronics Watch is an important step towards achieving this aim, as it provides a mechanism for universities across Europe to monitor their electronics supply chains effectively.

Approved and signed on 26 November 2024 by:

Professor Rama Thirunamachandran

Vice Chancellor