



**Canterbury  
Christ Church  
University**

# Modern Slavery and Human Trafficking Statement 2022-23 Financial Year

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 support of the full Governing Body and was presented for approval at the Governing Body meeting on 28 November 2023.

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

## **Procurement & Supply Chain**

- The University has in place a KPI to monitor training of staff who are managing contracts at high risk of modern slavery. This year 100% of these staff have completed the Higher Education Procurement Academy (HEPA) 'Guide to Modern Slavery' e-Learning Module.
- The University has in place an Operational Control Procedure (OCP) detailing how risks of modern slavery in the supply chain will be managed. It also outlines what action will be taken if such an activity is identified. This document forms part of the University's ISO14001 environmental management system.
- All tender processes that are run to award contracts for goods or services considered at high risk of modern slavery, the University requests information from all bidders outlining how they manage their risks in this area.
- The University continues to use framework agreements to award many of its major contracts. The framework awarding body ensures that modern slavery issues are adequately evaluated in the award of places on their framework agreements.
- Most framework agreements used by the University are awarded by the Southern Universities Purchasing Consortium (SUPC). SUPC and other regional universities purchasing consortia with whom we work are affiliated with the Electronic Watch to ensure compliance with labour rights and safety standards in the supply chain. This is particularly relevant for the high-risk areas such as the supply of IT equipment.

- The SUPC have stated that they are " committed to acquiring goods and services for its members without causing harm to others. Affiliating to Electronics Watch is an important step forward and will allow the SUPC to have eyes and ears on the ground in producer regions to ensure rights violations are detected and properly addressed."
- The University's standard terms & conditions include requirements that our suppliers monitor their supply chains for instances of modern slavery. If we need to use an alternative set of contractual terms (e.g., a supplier's terms) our Governance and Legal Services team reviews the terms prior to commitment to ensure provision is made relating to Modern Slavery Act compliance.

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.

#### **Non-Procurement Activities**

- Training and development in the application of all the University's staff policies is in place and is monitored by the Human Resources and Organizational Development Department.

The Unitemps temporary staffing agency operates under a franchise by the University's subsidiary. The agency falls outside of the scope of the modern slavery legislation, however, on a voluntary basis the agency complies with the requirements of the Modern Slavery Act. The actions taken by the staffing 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 2015.
- 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.
- High risk areas for agency staff have been identified as any sector where a gang master's licence is required, such as in agriculture. No Unitemps agency workers can be set assignments in these high-risk sectors.

**Approved and signed on 28 November 2023 by:**



**Professor Rama Thirunamachandran  
Vice Chancellor**