

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019/20**

### **1. Introduction**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (MSA) and sets out the steps taken by Roehampton University (trading as the University of Roehampton) during the year ended 31 July 2020, to ensure transparency in its supply chain and to prevent modern slavery and human trafficking taking place in its supply chains or in any part of its business.

This is the University's fifth annual Modern Slavery Statement since the MSA came into force. The University has never received reports of or discovered instances of modern slavery or human trafficking within its business or supply chains.

### **2. Our structure**

We are a private limited company incorporated in England and Wales, and an exempt charity. We are made up of four colleges - Digby Stuart College, Froebel College, Southlands College and Whitelands College - all of which are all located in Roehampton, South West London. Our core business is teaching and research.

In 2019/20, we had a total of 18,768 registered students (full person equivalent): of these 9,259 were on-campus students (49.3%), 7,888 off-campus students (42.1%) and 1,621 online students (8.6%). In 2019/20, we employed 1154 staff.

We have three wholly-owned trading subsidiary companies: Roehampton Corporate Initiatives Limited, Roehampton Hosting Services Limited and Roehampton Construction Services Limited. We are the majority shareholder in Roehampton Pathway Campus Limited, which we jointly own with QAHE (UR) Limited. None of our subsidiary companies meet the threshold for MSA reporting.

### **3. Our Supply Chains**

We have a centralised procurement function with transactional purchasing devolved to individual departments. Our procurement is conducted by way of in-house tendering and contracting, and collaboratively through regional higher education and government purchasing consortia. We engage with our purchasing consortia to address the issues of modern slavery and human trafficking and to support the inclusion of ethical sustainability in their procurement programmes. We also include such principles within our own institutional processes and procedures.

Our supply chains mainly fall under the categories of laboratory consumables and equipment, library resources, ICT equipment and services, estates goods and services and professional services.

We believe the principal areas that carry material risks are office supplies, laboratory consumables, ICT and audio-visual equipment, and some estates services, such as cleaning, catering and security services.

We rely on two carefully selected suppliers to provide our cleaning and catering services and recognise that areas of risk from them are the employment of staff to provide services at our premises and their use of subcontractors to supply goods and services. We are therefore committed to working with them to identify and report any non-compliance and to work with all statutory bodies should any investigations arise.

#### **4. Our Policies and due diligence on Slavery and Human Trafficking**

We are committed to acting ethically and with integrity in all our business and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in our business or anywhere in our supply chains.

A number of our policies and procedures demonstrate our commitment to combating modern slavery. Such policies include our [Dignity & Respect Policy](#); [Anti-Bribery and Corruption Policy](#); [Safeguarding Children and Vulnerable Adults Policy and Procedure](#) and [Public Interest Disclosure Policy](#).

The University is a member of the London Universities Purchasing Consortium (LUPC), which in turn is a member of Procurement England Limited (PEL), the shared vehicle by which English HE purchasing consortia manage joint development and improvement projects for collaborative procurement in the sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all PEL consortia members are committed. LUPC has developed actions to identify, prevent and mitigate the risks of modern slavery and human trafficking in the supply chains of its Members. LUPC has also developed a modern slavery risk assessment tool, in conjunction with the University of Greenwich, to gather information to help identify risks of human rights abuses in public supply chains.

The LUPC does not meet the turnover threshold but has published a [Modern Slavery Statement](#) as it considers that its members' spend (around £237m annually) warrants a statement on the risks inherent in its supply chains and the responsible steps it is taking to address them.

#### **5. Completed actions**

Since the MSA came into force, we have undertaken the following actions to ensure our compliance:

- (a) revised our Equality & Diversity Policy in 2016 to include an obligation to undertake contractor and supplier due diligence when selecting and evaluating contractors and suppliers;
- (b) imposed a requirement on contractors/suppliers to comply with anti-discrimination legislation, related codes of practice, the MSA, the University's relevant policies and terms and conditions for the supply of goods and services;
- (c) imposed a requirement on contractors/suppliers to demonstrate the above-mentioned compliance;
- (d) reserved our right to terminate contracts for non-compliance with applicable laws and our policies and terms and conditions for the supply of goods and services;
- (e) worked with our existing suppliers to confirm their supply chains and seek

confirmation of their continued compliance with applicable law and our relevant mandatory policies;

- (f) updated our standard selection questionnaire for all capital and contract purchases above the tendering threshold prescribed by the Public Contract Regulations 2015 to include questions on suppliers' policies, approaches and risk management processes;
- (g) updated the mandatory request for information provided to all new suppliers as part of our supplier adoption process. This is sent to all potential new suppliers and to existing suppliers in order to review their arrangements;
- (h) revised our standard terms and conditions of purchasing goods and services and other relevant contract templates to include MSA compliance provisions.
- (i) commenced the development of a contracts database to hold all contracts for the provision of goods and services and to assign responsibility to contract managers who will be appropriately trained to identify, manage and mitigate the risk of modern slavery and human trafficking. When fully operational, this will have the functionality to identify modern slavery risks (among other risks).
- (j) Convening a meeting of our Modern Slavery working group tasked with ensuring that we are successful in combatting modern slavery and human trafficking in our business and supply chains through the continued identification, assessment and mitigation of potential risks, and the continued monitoring of suppliers' compliance with applicable law and best practice.

## **6. Progress on actions for 2019/20**

During the 2019/20 academic year, we continued our work to identify and mitigate the risk of modern slavery and human trafficking in our supply chains, and progressed various initiatives commenced in previous years to combat modern slavery. Our work included:

- (i) Contacting some of our top 100 suppliers to ascertain their levels of compliance via completion of a questionnaire. This exercise commenced in the previous reporting period.
- (ii) Continuing to develop the contracts database referenced at paragraph 5 (i) above.
- (iii) Convening a meeting of our Modern Slavery working group to consider progress on 2018/19 actions and the further steps that can be taken by the University to ensure modern slavery compliance.

## **7. Proposed actions for 2020/21**

Work planned for the next 12 months include:

- (i) The roll out of modern slavery awareness training via an e-learning module to a wider range of our staff. It is intended that the module will be mandatory for all staff members with authority to approve financial transactions.
- (ii) Delivery of a modern slavery training session for Executive Officers and members of Council.
- (iii) The development of key performance indicators to measure our effectiveness in ensuring that modern slavery and human trafficking is not taking place in our business or supply chains.

(iv) The continuation of actions set out at paragraph 6 above.

This statement was approved by the University's senior management team on 26 January 2021 and by the Audit Committee on behalf of the Council of the University of Roehampton on [31 January 2021].

**Professor Jean-Noël Ezingard**  
**Vice-Chancellor**  
**31 January 2021**