

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018/19

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 financial year ended 31 July 2019, 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 fourth 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 2018/19, we had a total of 22,754 registered students - of these 9,248 were on-campus students (40.7%), 6,852 off-campus students (30.1%) and 6,655 online students (29.2%). In 2018/19, we employed 1,148 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 recognize that the United Kingdom's exit from the European Union may require us to seek alternative sources of supplies and equipment in some cases and as a result, may require us to put additional measures in place to ensure that we develop confidence in any new supply chain relationships.

We rely on two properly selected suppliers to provide our cleaning and catering services and have identified their areas of risk 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.

Our recent introduction of an Anti-Slavery and Human Trafficking Policy demonstrates our commitment to combatting modern slavery and reflects our zero-tolerance approach to slavery and human trafficking. Other policies that support our commitment in this area include our Dignity & Respect Policy, Anti-Bribery & Corruption Policy and Public Interest Disclosure Policy.

The University is a member of the London Universities Purchasing Consortium (LUPC). 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.

5. Completed actions

Since the MSA came into force, we have undertaken a number of actions to ensure our compliance and have taken reasonable steps to ensure that those within our supply-chain are also compliant, and evidence a commitment to combatting modern slavery and human trafficking. Such actions include:

- (i) revising of our Equality & Diversity Policy in 2016 to include an obligation to undertake contractor and supplier due diligence when selecting and evaluating contractors and suppliers;
- (ii) imposing a requirement on contractors/suppliers to comply with anti-discrimination legislation, related codes of practice, the Modern Slavery Act 2015, the University's relevant policies and its terms and conditions for the supply of goods and services;
- (iii) imposing a requirement on contractors/ suppliers to demonstrate compliance with the above obligations;
- (iv) reserving 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;
- (v) monitoring and reviewed of our suppliers' compliance;
- (vi) updating 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;

- (vii) updating 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; and
- (viii) implementing an Anti-slavery and Human Trafficking Policy.

6. Progress on 2018/19 actions

In our 2017/18 Modern Slavery Statement, we identified the following activities that were in progress or planned, and which we would aim to complete by the publication date of this current statement:

- Review our procurement due diligence process.
- Work with our existing suppliers to confirm their supply chains and seek confirmation of their continued compliance with applicable law and our relevant mandatory policies.
- Raise awareness of modern slavery and human trafficking within our University community and among our key stakeholders.
- Develop training for a wider range of our staff.
- Publish our revised standard terms and conditions for the provision of goods and services.
- Establish a 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.

During the 2018/19 academic year, we progressed the actions above and have:

- Commenced use of our new due diligence questionnaire – this has been issued to our key existing suppliers. It is now part of our standard due diligence process and we will continue to issue it to our top 100 suppliers.
- Established a Modern Slavery Working Group – the Group has met and identified its priority tasks for the next 12 months including the roll out of suitable training for relevant staff to ensure that they have a good level of understanding of modern slavery and human trafficking risks in our supply chains.
- Published our new standard terms and conditions for the provision of goods and services – these terms and conditions contain modern slavery and human trafficking clauses which all suppliers must comply with.

7. Further steps

We recognise that we have more to do to raise awareness of modern slavery within our University community, and to ensure that staff have a good understanding of the risks of modern slavery and their role in helping to University to tackle this issue. Awareness raising and the provision of appropriate training are therefore priority areas for us in this current academic year.

The Modern Slavery Working Group has identified the eLearning suite *Protecting Human Rights in the Supply Chain* which was developed by the LUPC in collaboration with APUC and the University of Greenwich, as a valuable training resource especially for our public procurement professionals. The suite covers such topics as the importance of protecting human rights in the supply chain within the public sector, how to assess and prioritise risks,

how to monitor supply chains, how to respond to abuses and how measure and report effectiveness. The Higher Education Procurement Association's online modern slavery training has also been identified as a useful training resource.

In addition to improving on our awareness raising and training provision, we will: (i) continue to issue our due diligence questionnaire to our existing customers and will be approaching all of our top 100 suppliers to ascertain their levels of compliance, and will also be following up with any suppliers who fail to respond to our questionnaire; (ii) seek to implement a contracts management database with the appropriate functionality to enable us to identify, manage and mitigate risks including modern slavery; (iii) seek to develop measures by which we can judge how effective we are at combatting modern slavery and human trafficking in our business and supply chain.

Progress on these initiatives will be monitored by the Modern Slavery Working Group, and this Statement will be reviewed annually.

Professor Jean-Noël Ezingard

Vice-Chancellor

31 January 2020

[Subject to approval by

the Finance and Estates Committee of Council]