

## **Modern Slavery and Human Trafficking**

In accordance with Section 54 of the Modern Slavery Act 2015, the University is required to prepare a slavery and human trafficking statement for each financial year, setting out what steps it has taken to ensure modern slavery is not taking place in its business or supply chains.

The University's slavery and human trafficking statement for the financial year ended 31 July 2022 is below.

### **Slavery and human trafficking statement for the period ended 31 July 2022 (issued pursuant to section 54 of the Modern Slavery Act 2015)**

#### **POLICY STATEMENT**

The University is committed to ensuring that there is no slavery or human trafficking in our supply chains or any part of our business. The processes set out below reflect the University's commitment to acting ethically and with integrity across the organisation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University's slavery and human trafficking statement for the financial year ended 31 July 2022.

This statement was approved by the General Purposes Committee of Council on **17/10/22** and has been signed and dated by Professor Louise Richardson, Vice-Chancellor.

#### **THE STRUCTURE, BUSINESS AND SUPPLY CHAIN OF THE UNIVERSITY OF OXFORD**

##### **Structure**

The University of Oxford is a civil corporation established under common law, which was formally incorporated by the Act for Incorporation of the Universities of Oxford and Cambridge 1571 under the name of 'The Chancellor Masters and Scholars of the University of Oxford'. The University of Oxford is an exempt charity under the Charities Act 2011.

The University is composed of academic departments and research centres, administrative departments, libraries and museums as well as a number of joint ventures and subsidiaries (as listed in its annual financial statements). Further information about the structure of the University structure can be found here: <https://www.ox.ac.uk/about/organisation>

Oxford University Press is a department of the University, and not a separate legal entity. However, it has a different financial year-end to the rest of the University and as such, has produced its own [Modern Slavery Act statement](#). This statement is made in respect of the Press's financial year ended 31 March 2022.

The University also has a number of joint venture and subsidiary activities.

##### **Business**

The University operates in the Higher Education Sector and aims to lead the world in research and education. We seek to do this in ways which benefit society on a national and a global scale. The University's current [strategic plan](#) runs from 2018-2024 and sets out the key operations of the University.

## Procurement

The supply chain of the University includes a large number of diverse suppliers from across the world, including suppliers of goods and services that directly support research and teaching activity, for example large scale laboratory equipment and laboratory consumables, and suppliers of indirect goods and services.

In FY 21/22, the University's third party spend fell into five main categories:

Science (e.g. consumables, equipment)	39%
Professional Services (e.g. temporary staff, consultancy)	23%
Estates (e.g., construction, facilities management, maintenance)	21%
IT (e.g. telecoms, hardware, software)	11%
Commodities (e.g. travel, books, office supplies)	6%

The University has supporting systems in place to identify and assess potential risk areas and to mitigate the risk of slavery and human trafficking occurring in our supply chains.

When reviewing our supply chain from a risk perspective, we consider both the types of goods and services we procure and the location we procure these from.

The University requires suppliers to complete a due diligence questionnaire in respect of all contracts exceeding £100,000 (ex-VAT) in value and recommends the questionnaire for use by departments when contracting between £25,000 and £100,000 (ex-VAT). This questionnaire includes a potential ground for rejection relating to convictions under the Modern Slavery Act 2015 and asks that suppliers confirm they comply with and have written policies and staff training in place in respect of, s54 of the Modern Slavery Act 2015.

Modern slavery requirements have been included as a Pass/Fail question in the award of all recent frameworks established to support the University's Estates Capital Projects. This includes Cost Consultants, Technical Designers and Constructors. The University's Estates Services also make use of Constructionline, where level 2 and 3 registered suppliers must provide details on their policies and how these are communicated and enforced within their organisations.

For purchases under £25,000 (ex-VAT) a more limited due diligence checklist is recommended which asks suppliers to confirm there have been no convictions under the Modern Slavery Act 2015, or if there have been that appropriate steps have been taken to rectify the identified issues.

All preferred suppliers have at least an annual review and are asked to provide written confirmation that no convictions have occurred in relation to the Modern Slavery Act 2015, or if a conviction has occurred that appropriate steps have been taken to rectify the identified issues. All preferred suppliers are requested to provide their Modern Slavery Act 2015 policy statement as part of the review documentation, and an additional question has been included in the review template to identify specific actions taken to combat modern slavery during the previous twelve-month period. We expect this to prompt suppliers to improve their statements year on year.

The questionnaire and review templates can flag high risk goods and services within our direct, centrally managed spend such as Personal Protective Equipment; Information technology equipment; Other clothing (i.e branded merchandise we sell) and Outsourced labour (e.g. security services, cleaning,

housekeeping). They have been developed for use in preferred supplier reviews to further support the identification and management of supply chain risk. These prompt discussions with the supplier regarding the management of their onward supply chains.

The University is reviewing supplier engagement tools and will initiate further discussions with preferred suppliers in FY22/23. Supplier key performance indicators will be developed to help the University better assess its effectiveness at identifying and managing risks related to Modern Slavery and Human Trafficking in its operations and supply chain.

## OUR POLICIES

The University has a number of policies which govern our activities and aim to reduce the risks of modern slavery and human trafficking in our operations and supply chain:

### Anti-slavery and anti-trafficking policy

The policy is available on the [Compliance website](#) and is overseen by Personnel Committee.

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as defined in the [Modern Slavery Act 2015](#). The University also considers other related malpractice, including child labour, unsafe working conditions or excessive working hours, within this definition for the purposes of the policy.

The prevention, detection, and reporting of modern slavery (and other related malpractice as set out above) in any part of its business or supply chains is the responsibility of all those working for the University or under its control.**HR Policies**

The University's approach to recruitment, including specific expectations in respect of the recruitment of children is set out on the [HR Support website](#).

HR guidance to recruiting departments covers the following areas:

- ID and other documents: original documents must be seen as part of the right to work and other pre-employment checks, but copies must be taken for the files and the originals handed back to the owner.
- Employment of under-18s: UK legislation on the employment of minors is set out in the guidance and departments are instructed to follow it. The guidance on right to work checks asks departments to check that dates of birth are consistent across documents and consistent with the appearance of the individual.
- Temporary staff: where temporary staff are recruited via the University's own Temporary Staffing Service (TSS), the University's required pre-employment checks are carried out by TSS. If departments recruit temporary staff via external agencies, those agencies are asked to confirm that they carry out the same pre-employment checks as the University.

The University is committed to ensuring that people are paid appropriately for the work that they carry out. This commitment is set out in the information on pay [structures](#).

The University is an accredited Living Wage employer. This means that the University has committed to pay both employees, and the staff of contractors and sub-contractors who work regularly (i.e. two hours or more over eight consecutive weeks within a year) on University premises in the UK at or above the Living Wage rate. The University is also an accredited Oxford Living Wage employer. All departments therefore pay the Oxford Living Wage or more to all employees and casual workers.

## Public Interest Disclosure (Whistle-blowing) Code of Practice

The University places the greatest importance on the integrity of its operations, and has in place a number of policies and procedures to address problems that may arise for its employees and students. Where there are genuine concerns about possible malpractices or improprieties that are not adequately covered by other University policies or procedures, staff are encouraged to make a [public interest disclosure](#). This code of practice therefore provides an additional means for people to raise concerns about a supply chain or an individual who may be at risk. The University has begun a process of reviewing this Code and notes that while this process is underway should anyone outside the University wish to raise concerns regarding risks around modern slavery and human trafficking at the University or in our supply chain they may do so either directly with their procurement contact or by emailing [compliance@admin.ox.ac.uk](mailto:compliance@admin.ox.ac.uk).

## DUE DILIGENCE PROCESSES AND ON-GOING MONITORING

### HR

At the point of recruitment, the University ensures that [appropriate checks on prospective employees](#) are completed in accordance with the law.

HR colleagues monitor that the University's on-boarding policy is being followed on an on-going basis via an annual HR audit process. TSS follow the University processes.

The University has preferred recruitment agencies (where TSS is not used) which are subject to the procurement due diligence and monitoring processes below. Please see also the reference above to the processes followed as an accredited Oxford Living Wage employer.

### RISK ASSESSMENT

The University regularly reviews its risk profile as it relates to modern slavery and human trafficking risks, with core overarching areas of risk identified related to employment and procurement activities.

#### Employment:

We employ c.15,000 staff in more than 120 countries worldwide. Approximately 0.7% of our employees work on a permanent basis outside of the UK. We offer a number of policies which support our employees with their wellbeing in addition to the policies and procedures referenced elsewhere in this statement.

The Temporary Staffing Service (TSS) is the University's internal recruitment service, providing temporary administrative support to the University of Oxford's departments and colleges. It has on average around 300 temporary workers at any time. Most of these are skilled workers based in academic or professional service departments. TSS provides detailed guidance for managers wishing to recruit this category of worker.

The University is an accredited Living Wage employer. In order to maintain accredited status the University has committed to pay both employees, and the staff of contractors and sub-contractors who work regularly on University premises in the UK at or above the Living Wage rate.

Our highest areas of risk related to employment and modern slavery or human trafficking are activities conducted outside of the central University operations and oversight.

### TRAINING

The University provides its managers with [guidance on the recruitment process](#). Training on recruitment and selection is also provided. It is compulsory for chairs of recruitment panels, and some departments make the training mandatory for all panel members, although it is also open to any interested staff.

Guidance for managers on using the University's internal [Temporary Staffing Service](#) and [external temporary agencies](#) is also provided.

All members of the Purchasing Department have received training on supplier review templates and guidance and have completed the HEPA Modern Slavery Act Training. This training has also been communicated to HR contacts across the University via the HR newsletter.

## **FURTHER INFORMATION**

Further information may be obtained from Ruth Kinahan ([ruth.kinahan@admin.ox.ac.uk](mailto:ruth.kinahan@admin.ox.ac.uk)), HR Policy Manager, and Claire Seeley ([claire.seeley@admin.ox.ac.uk](mailto:claire.seeley@admin.ox.ac.uk)), Deputy Director of Purchasing