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UNIVERSITY OF GLOUCESTERSHIRE

University of Gloucestershire
Slavery and Human Trafficking Statement – 2024 Review

1.0 Introduction

1.1 The University of Gloucestershire is a higher education establishment that employs approximately 1,500 staff members, teaches in the region of 9,000 students and purchases around £23m per annum of goods, services and works through various supply chain arrangements. The University is registered as a company, no: 06023243.

1.2 The University is committed to employing staff, engaging with and supporting our students, acquiring goods, services and works for its requirements, and otherwise conducting its business without causing harm to others. In so doing, we are committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

1.3 The University have a zero-tolerance policy in relation to modern slavery and human trafficking and is committed to continuing to work with the newly formed Gloucestershire Anti-Slavery Partnership to keep addressing areas of higher risk and concern.

2.0 Purpose of this statement

2.1 This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our Members, students, staff, and other stakeholders about the University and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

3.0 Identified risks and steps being taken

Direct employment of staff

3.1 The University and its subsidiaries mitigates the risk of the occurrence of modern slavery in its teams of directly employed staff through strict adherence to its robust HR recruitment and candidate selection policies. Additionally, the University has a whistle blowing policy through which staff can raise concerns.

Employment of staff through recruitment agencies and other sources

3.2 Temporary staff and other staff recruited indirectly by the University are only recruited through established and accredited sources who can provide assurance that they fully comply with the requirements of all legislation relating to the rights and welfare of their candidates and employees.

Students

3.3 Although the risks of students experiencing occurrences of modern slavery or human trafficking through direct contact with the University are extremely low it is appreciated that whilst living within Cheltenham and Gloucester and the surrounding area, they may become aware of such instances or on very rare occasions be entrapped into adopting the life style of a modern slave. In order to mitigate these circumstances, the University has in place easily accessible and well known channels through which students can obtain assistance, support and advice on their wellbeing.

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3.4 Staff within the Student Services Department, as well as officers and staff members within the University's Students' Union, will receive training briefings on the issues related to modern slavery, and how students can be supported should they present with related concerns.

Supply chain

3.5 The University's supply chain has been identified as the area of highest risk in terms of possible occurrences of modern slavery. In order to mitigate this the following action has been taken:

3.6 The University's procurement function is supported by a published and implemented Sustainability Strategy and Procurement Strategy to which we are fully committed. These strategies contain steps that form part of the supplier selection process and lead to ensuring that slavery and human trafficking are not taking place in the supply chain.

3.7 The University is a member of the Southern Universities Procurement Consortium (SUPC), which works with the other UK higher education procurement consortia to deliver and manage large joint purchasing, developmental and improvement projects for collaborative procurement within the sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all member consortia are committed. This policy contains steps that form part of the supplier selection for the major contract procurement processes that are conducted for the consortium members, and supports ensuring that slavery and human trafficking are not taking place in the supply chain.

3.8 The following procurement categories have been identified as higher risk in terms of finding modern slavery and human trafficking occurrences in the supply chain:

- Science, Technical, and Engineering Goods and Services
- Security Services
- ICT Equipment and Services
- Estates/Facilities Goods and Services
- Construction
- Catering
- Stationary and Office Equipment
- Books and Periodicals
- Domestic Services

3.9 When procuring goods, works and services in the higher risk categories the University ensures that suppliers are required to prove a high level of corporate social responsibility during the tendering and selection process.

4.0 Our Progress and plans for the future

4.1 As part of this reporting exercise in this and the coming years, The University of Gloucestershire expresses its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working within them.

4.2 Since our last statement we have continued to monitor the supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. We will continue to monitor these supply chains closely and take appropriate action if necessary.

4.3 Through the procurement category lead buyer initiative, the University has raised awareness of modern slavery and human trafficking considerations within specific procurement categories. These considerations have formed part of the supplier selection process for goods, works and services in these categories.

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4.4 Our suppliers in the higher risk areas have been asked to commit to the Base Code of the Ethical Trading Initiative (ETI) and are working to persuade all suppliers in these 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, requiring that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

4.5 The University is an active member of The Gloucestershire Anti-Slavery Partnership and a number of our staff team members have received online updates aimed at raising awareness of the risks of modern slavery in the local community. The knowledge gained from this initiative has been cascaded to and shared with our front facing teams to support the effective delivery of their roles.

4.6 On 12 March 2021 the Home Office contacted all relevant organisations requiring them register on and publish their annual modern slavery statements to the new government modern slavery statement register by 9 April 2021. The University duly complied and our current statement can be viewed here.

4.7 The University's 'Modern Slavery and Human Trafficking Guidance' centralised web page has been developed on the University's Staffnet and guides readers to a number of key sources of information relating to modern slavery and human trafficking.

4.8 This Statement has been approved and published by the University Council and will be reviewed at least once annually.

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Nicola de longh
Chair of Council