Modern Slavery Statement

Financial year ending 31 July 2022

Introduction

The Modern Slavery Act 2015 ("Act") was introduced to help eradicate slavery, forced labour and human trafficking in the operations and supply chains of companies. This statement is made pursuant to Section 54, Part 6 of the Act and includes information about the Jisc Group, its own operations and supply chains, and how we are approaching the eradication of slavery and human trafficking within our business.

Our commitment

Jisc is committed to preventing and mitigating exploitation, bribery and corruption. We will not accept modern slavery, forced labour and human trafficking anywhere within our operations or supply chain. As part of our Corporate Social Responsibility strategy, we have committed to undertaking a risk analysis of our supply chain to inform a plan to improve transparency and accountability in our supply chain. A working group has been constituted to further develop our approach to combatting modern slavery.

Our commitment is set out in further detail in our Modern Slavery policy.

Jisc Group structure

The Jisc Group includes Jisc as the parent company with three active subsidiary companies - Jisc Services Limited, Jisc Commercial Limited and Jisc International Singapore Pte Limited.

Jisc is the only company in the Jisc Group which is required to produce a Slavery and human trafficking statement, though the risk areas and activities outlined in this statement apply equally to all companies in the Jisc Group.

What Jisc does

We are the UK's digital agency for lifelong learning and research. Our vision is for the UK to be world leaders in technology for education and research.

We deliver e-infrastructure services, solutions to enable education and research, advice and guidance and new solutions through research & development. Our work is UK wide, providing services and support to universities, colleges, schools, research institutes and many other national institutions. We are a membership organisation, working to deliver considerable collective digital advantage, financial savings and efficiencies for our members, ensuring these benefits are sustained and enhanced and to do all this as affordably, efficiently and as cost effectively as possible.

We also have a subsidiary company in Singapore to support Open Athens which is being used widely across the UK and internationally as a key component to support education and charity worldwide with a single service sign on for remote access.

Jisc operations

We directly employ 979 staff across the UK, as a combination of office-based staff and home-workers. We are confident that our own operations are free of modern slavery, forced labour and human trafficking. Colleagues across the Jisc Group work under comparable terms and conditions that are in accordance with UK employment law, and we are an accredited Living Wage Employer. The move to home-based working as a result of the Covid-19 pandemic has resulted in staff being moved to hybrid contracts, based on a combination of home and office-based working. Health, safety and well-being support is in place for all staff including access to a network of Mental Health First Aiders and specialist counselling support.

Policies

We have a range of employment policies in place which ensure that our employees are fairly treated, supported, remunerated and understand the behaviour expected by the organisation. These are listed in our Modern Slavery policy and are available on request.

Supply chains and risk areas

We have a team of procurement specialists managing procurement processes. The suppliers we use to deliver our activities, and our own operations, are primarily EU based.

We contract with a range of suppliers, from large international IT companies to local cleaning and catering companies. Our risk analysis of our supply chain is allowing us a better understanding of supply contracts where there is a greater risk of exploitation.

We also create, negotiate and have access to a series of frameworks - umbrella agreements put in place with a group of suppliers who fit certain criteria and in accordance with the EU public contracts regulations 2015. These frameworks are available to our members, who rely on us to have completed modern slavery compliance checks on suppliers. We are exploring how we can improve our oversight of these suppliers.

We acknowledge that some of our supply chains involved in the mining of some rare earth materials (such as cobalt) required to produce computer hardware and devices are untraceable and that there are limitations in understanding the degree of the risk of exploitation.

Our Modern Slavery policy describes supplier obligations in reporting breaches of the modern slavery regulations and Jisc's Whistleblowing Policy explains how members of staff can also report breaches.

Due diligence

As part of our approach to maintaining a supply chain that is free of modern slavery, forced labour and human trafficking, we require commercial organisations meeting the criteria within the Modern Slavery Act 2015 to provide a copy or link to their anti-slavery statement. Our own modern slavery policy is shared with suppliers during procurement processes. We have trialled a self-assessment questionnaire for suppliers identified within our high-risk areas and will continue to monitor whether this can be rolled out further or additional due diligence checks implemented.

Through our standard contract we require suppliers to report any breach or suspected breach of the Act associated with our contract to us immediately. We reserve our rights to terminate contracts with suppliers in the event that there is evidence of non-compliance with the Act. Opportunities to develop our approach further are being reviewed.

Training and awareness raising

Awareness raising amongst our employees is key to ensuring that risk areas are recognised, and employees know what to do if they become aware of any concern associated with exploitation. All staff are required to complete a mandatory modern slavery awareness training course on our training

platform. The Modern Slavery policy and this statement are also actively shared with all staff to help colleagues understand their responsibility as individuals to report behaviour which they believe suggests a breach of the Act. Our Whistleblowing Policy includes appropriate guidance for staff in reporting any suspicion of inappropriate or illegal behaviours.

Procurement staff are trained annually through the Chartered Institute of Procurement and Supply (CIPS).

Actions in the last reporting year

In the last reporting year, we have:

- A dedicated Modern Slavery working group continues to operate to assess risk areas, implement improvements and monitor progress against our Modern Slavery objectives and policy. Our working group is comprised of a cross section of employees from Governance, Procurement, Contract Management, Legal, Public and External Affairs, Diversity and Inclusion and Corporate Social Responsibility
- All existing staff are required to complete a mandatory modern slavery awareness training module on our learning platform. There is also a process in place for new starters to complete the mandatory training. The mandatory training is continually being reviewed for enhancements and additional training is reviewed where appropriate
- Registered with the Home Office modern slavery registry and uploaded our 2021 modern slavery statement
- Chosen Unseen as our corporate charity of the year for 2022 which is a UK-based charity working towards a world without slavery
- Updated our annual supplier check program to include reviewing our supplier's Modern slavery statements
- Maintained our affiliate membership of Electronics Watch, a monitoring organisation to audit the supply chain of technology components
- Appointed a Head of Environmental Sustainability and Environmental Sustainability Officer to identify further plans that can support our plans across the three strands of the Corporate Social Responsibility Strategy which includes business ethics, environment and community
- Appointed a Corporate Social Responsibility consultant to undertake a risk analysis of Jisc's supply chain and create an action plan to improve transparency and accountability.
- Commenced the mapping of the Jisc supplier chain, starting with the high-risk areas identified by Marisol Bernal (LUPC Responsible Procurement Lead) which were cleaning, security, catering and ICT manufacturing
- Completed a trial of increased due diligence checks within our supplier chain in a high risk area and we are looking to continue this for all high risk areas going forward.
- Shared our Modern Slavery policy with suppliers and requested that they cascade it to their employees and upload their statements onto the Gov.uk site
- Modern Slavery references have been updated in our contracts
- Created a Corporate Social Responsibility Intranet page with a dedicated section in relation to activities and actions Jisc is taking in relation to our Modern Slavery objectives and policy
- Reviewed recruitment processes and whether further improvements could be made to mitigate modern slavery

We have not received any reports of potential or actual breaches of the Act and no procurements or contracts have been terminated as a result of concerns regarding compliance with the Act.

Future plans

In the coming financial year (from 1 August 2022 to 31 July 2023), we will:

- Continue to work with Unseen as our corporate charity of the year for 2022 to raise funds, gather supplies and raise further awareness. A charity sky dive will also be taking place in September 2022 with Jisc employees taking part to raise funds and awareness.
- Create a communication plan throughout 2022 leading up to the Anti-Slavery Day on 18 October 2022.
- Continue the risk analysis of our supply chain to identity areas for improvement.
- Review enhancing mandatory training for the departments overseeing high risk area suppliers to raise further awareness.
- Embed the modern slavery self-assessment questionnaire and scrutiny into all high risk contracts and procurement processes during 2022-23
- Review whether the modern slavery self-assessment questionnaire can be rolled out further within the supply chain or additional due diligence checks implemented
- Continue to raise awareness of the Act within Jisc via our learning platform, presentations at staff meetings and via the Jisc Procurement Team.

This statement will be made available on the Jisc website via a prominent link from Jisc's homepage, alongside our Modern Slavery policy. It will, in addition, be provided on request to all those organisations in receipt of Jisc services.

Signed on behalf of the Jisc board under its delegated authority on 20 September 2022 including approval from the following:

Professor Paul Boyle
Chair

Heidi Fraser-Krauss
Chief executive