

# Modern Slavery Statement

Financial year ending 31 July 2024

## 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. We are committed to undertaking a risk analysis of our supply chain to further develop a plan to improve transparency and accountability in our supply chain.

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 two active subsidiary companies - Jisc Services 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, data and technology agency focused on tertiary education, research and innovation.

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.

## Jisc operations

As at 31 July 2024, we directly employ 1,322 staff 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. 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. Our employment policies 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 rolled out a self-assessment questionnaire to all suppliers identified within our high-risk areas and will monitor how this can be rolled out further or where additional due diligence checks need to be implemented. Relevant advice and support will be sent to organisations that have returned a self-assessment questionnaire where there are gaps or opportunities to improve their organisation's modern slavery commitment.

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.

We are in the process of rolling out fuller due diligence checks for all current and proposed new suppliers.

## Responsible recruitment

With guidance from Unseen (a modern slavery charity), we reviewed our recruitment processes to ensure we are doing all we can to mitigate modern slavery. We have focused on raising awareness and incorporating this into our interactions with candidates at the hiring and onboarding stage.

## 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 when they join Jisc and this is repeated every two years. 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, and mandatory training on whistleblowing is completed by all staff when they join Jisc and repeated every two years.

In addition, Jisc's intranet has information to support staff with queries around Modern Slavery. This includes identifying signs of possible modern slavery and how to report it. The page also includes a summary of the modern slavery mandatory training course and team discussion points.

Procurement and Supplier Management staff are trained annually through the Chartered Institute of Procurement and Supply (CIPS). Further modern slavery training from HEPA was rolled out last year for individuals in Jisc teams (Legal, Governance, Procurement and Supplier Management and Facilities) that deal specifically with high-risk suppliers. This is available to all members of these teams that deal with supply chain management.

## Actions in the last reporting year

In the last reporting year:

- We shared our 2023 Modern Slavery statement through the Home Office modern slavery registry
- We continued to support Unseen, a UK-based charity working towards a world without slavery (our corporate charity of the year for 2022) with use of our office space
- We updated our annual supplier check programme to include reviewing our supplier's Modern slavery statements
- We maintained our affiliate membership of Electronics Watch, a monitoring organisation to audit the supply chain of technology components
- We agreed Sustainability as a priority programme and have dedicated resource to support the launch of a Sustainability strategy in autumn 2024
- We continued to roll out our self-assessment questionnaire to all high-risk suppliers via contract managers. Returned questionnaires are reviewed to see where there is opportunity for Jisc to support and advise smaller organisations to be more compliant
- We have 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
- We continued to update our Sustainability Intranet page with a dedicated section in relation to activities and actions Jisc is taking in relation to our Modern Slavery objectives and policy

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 2024 to 31 July 2025), we will:

- Review how to engage more with our suppliers about modern slavery – reviewing self-assessment questionnaires from high-risk suppliers and bid submissions and working with suppliers to advise and support where appropriate.
- Explore the opportunity to send self-assessment questionnaires to all suppliers going forward.
- Continue the risk analysis of our supply chain as we gather more data through new business bids and continue ongoing reviews of our existing supply chain to identify areas for improvement via the modern slavery self-assessment questionnaire
- Continue to provide enhanced training for the departments overseeing high risk area suppliers to raise further awareness, and roll out more widely as we believe is necessary
- Continue working with Electronics Watch to gather and review supplier information.
- Identify risks in new procurements using the Policy Procurement Note (PPN) Tackling Modern Slavery in Government Supply Chains table of characteristics and complete appropriate checks on subcontractors.
- Review supplier's Modern slavery statements regularly to assess existing suppliers and aim to request these annually from suppliers

- Continue to raise awareness of modern slavery 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 26 September 2024:

A handwritten signature in dark ink, appearing to read 'P Boyle', with a stylized flourish at the end.

Professor Paul Boyle  
Chair

A handwritten signature in dark ink, appearing to read 'H Fraser-Krauss', with a stylized flourish at the end.

Heidi Fraser-Krauss  
Chief executive