# Modern Slavery Act 2015: Annual statement 2022

Reporting period August 2021 to July 2022

# Contents

Employs around
## 8,000
staff (UK)

Five faculties containing
## 27
schools and departments

Supported by
## 16
professional services departments

Total income
## £696m
(2020-21)

Operating expenses
## £241m
(Spend outside of pay 2020-21)

# 1. Introduction

## The University of Nottingham, UK ('the university') is committed to combatting modern slavery and human trafficking. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the university's modern slavery and human trafficking statement for the financial year ending 31 July 2022.

## Organisational structure

The university has gained an outstanding international reputation for its world-class teaching and research. The university employs around 8,000 staff, across five faculties containing 27 schools and departments supported by 16 professional services departments.

The five faculties are: Arts, Engineering, Medicine and Health Sciences, Science, and Social Sciences. The university also has six research "Beacons of Excellence" that are committed to solving today's global challenges, including the Rights Lab: the largest group of modern slavery scholars in the world, and home to the world's leading academic experts on modern slavery.

The university is a corporation formed by Royal Charter and holds charitable status. Two main bodies are involved in the governance of the university, the Council and the Senate. At the head of the university is the Chancellor and Vice-Chancellor. The day-to-day management of the university is the responsibility of University Executive Board.

## Our policy on slavery and human trafficking

The university is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The university's Modern Slavery and Human Trafficking Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

A link to the university's anti-slavery policy can be found at: nott.ac/modern-slavery-act

## Our supply chains

The university purchases goods, services and works from a diverse range of suppliers, across a number of categories. It is recognised that the university's supply chains are global and complex when considering multi-tier suppliers, therefore Procurement have utilised the expertise of the Rights Lab to identify the highest risk areas within these categories of spend. This joint approach helps inform both the prioritisation and risk impact as the university continues to develop its due diligence processes. The university recognises modern slavery risks are present throughout the contracting lifecycle and is therefore embedding due diligence into its contract and supplier management programme.

The university also undertakes a significant amount of collaborative work with research partners and this area has been included as part of the university's approach when adopting due diligence processes in relation to its obligations under the Modern Slavery Act (MSA) 2015.

# 2. Steps taken in 2021-22

The university has implemented a pioneering 38-step Blueprint to achieving a slavery-free campus. This is an ambitious transformational social value approach, the first of its kind globally, and is aligned with the principles of the Modern Slavery Act 2015. This approach has University Executive Board sponsorship, Council endorsement and was launched publicly in July 2021 by the university's Chancellor, Baroness Lola Young. Founded on research led by the university's world-leading Rights Lab in 2020 and commissioned by the university's Modern Slavery Act Working Group, the blueprint acts as a guide for all universities to take action towards becoming slavery free.

The Blueprint covers four areas; governance, awareness/training, managing risk in the supply chain and civic engagement. A Working Group has been built to deliver the blueprint and significant progress has been delivered to date and during 2021-22. The Working Group's structure reflects the university's supply chain and flow of funding both into the university (teaching, research, commercial activities, donations) and out (payroll, suppliers, investments), to be well placed to lead improvement in each area.

The university intends to lead the Higher Education sector in this slavery-free campus work globally and inform the approach taken by other public sector organisations, leveraging its in-house expertise but also the shared vision and drive for solving problems and improving lives.

The Working Group published the 8,000-word report **The Slavery-Free Campus: A Blueprint for university action against modern slavery**, in 2021. The Blueprint guides the university on how to systematically work towards a slavery-free campus and is a blueprint for adoption by others.

During 2021-22 we have disseminated the Blueprint widely as shown in the map in figure 1.

**The Slavery-Free Campus:**
A blueprint for university action against modern slavery

July 2021
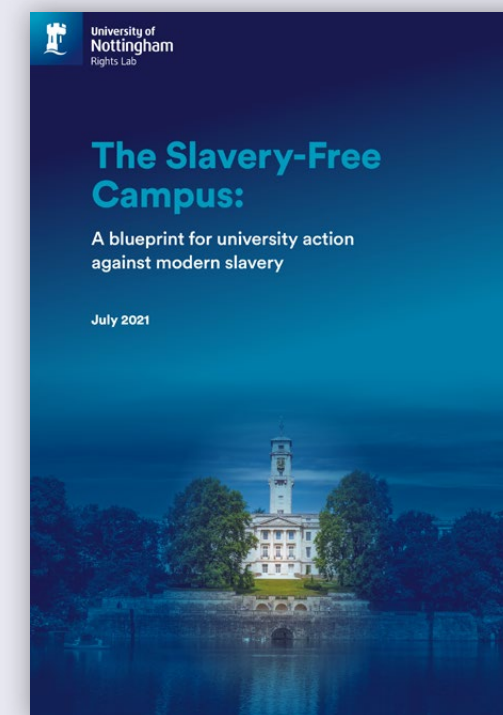
**Figure 1: Overview of wider dissemination of the Slavery-Free Campus**



Global dissemination (early engagement with universities in US, Australia and Malaysia)

UK

The Midlands

UK examples of engagement:
- Nottingham and Nottinghamshire
- ARC (19 Midlands universities) and West Midlands Slavery Free Campus Alliance
- LUPC and SUPC (London universities and Southern universities purchasing consortia)
- Cabinet Office, London
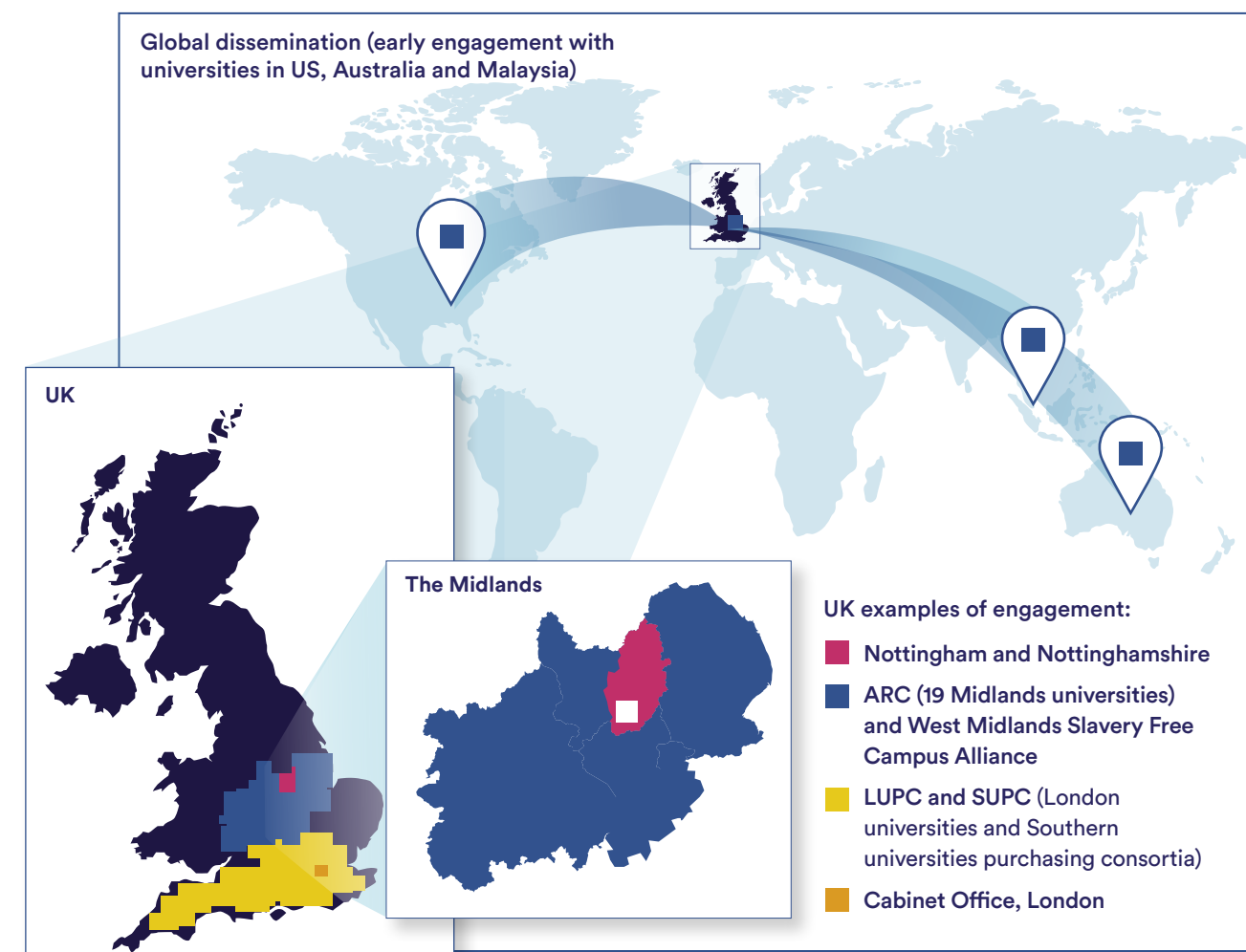
## Governance

**We have continued to evolve our approach to governance around modern slavery work at the university to become a slavery-free campus based on our 38-step Blueprint and have expanded the membership of the Working Group responsible for delivering this. We continue to have overt sponsorship from our University Executive Board and our Chancellor for this work. This year we achieved the following:**

✓ **We have translated our Blueprint into a multi-year plan with clear ownership and responsibility assigned across the Working Group. We have indicated annual targets for our Blueprint maturity score and currently this shows us being a slavery-free campus by the year 2025-26.**

✓ In order to deliver our ambitious plan, we have expanded our Working Group to achieve greater representation from Estates, have linked in more formally with Finance, and have built an overview of all key internal/external stakeholders.

✓ All suppliers are now required to sign up to NetPositives as part of the tender award process. This system enables the university to keep track of the number of new suppliers and, of those, the ones who are required to complete Modern Slavery Act (MSA) statements themselves. There are now 1,385 suppliers signed up to NetPositives, an increase of 102 for 2021-22.

✓ **The new NetPositives dashboard has been incorporated into the Key Performance Indicator (KPI) suite of our Modern Slavery dashboard. The dashboard enables us to monitor our supply chain risk and complexity alongside our slavery-free campus blueprint score.**

✓ We maintained >85% of contracts with control over modern slavery clauses. This was achieved in spite of an increase in our number of suppliers as activity increased post Covid. In terms of international suppliers, 50% are EU based, 25% are in North America, 12% in Asia, 8% in Africa, and 5% in South America.

✓ Our university's whistleblowing policy is in place and an annual report is made to University Council. There were no modern slavery issues in the latest whistleblowing report.

✓ **In 2021-22 we targeted a Blueprint maturity score of 68% and achieved 68% – see figure 2 for an overview of recent and future planned progress.**

✓ **We undertook a desktop review of all current Research and Innovation partners in order to identify any potential risk from their business activities.** The review focused on the location of the company HQ and associated in-country modern slavery risk, along with the nature of the business and how profits are derived to identify known modern slavery risk within the field of business. There was no immediate risk flagged from any of our active Research and Innovation partners.

✓ **We undertook a review of university policies in order to ensure that modern slavery is appropriately referenced.** We identified three policies where modern slavery or human rights violations are directly referenced (Modern Slavery and Human Trafficking Policy, Investment Policy, Procurement Policy) and six further policies that have the potential to directly reference modern slavery and that will be analysed in more detail.

**Figure 2: Maturity score and Modern Slavery dashboard**



Figure 2: Maturity score and Modern Slavery dashboard
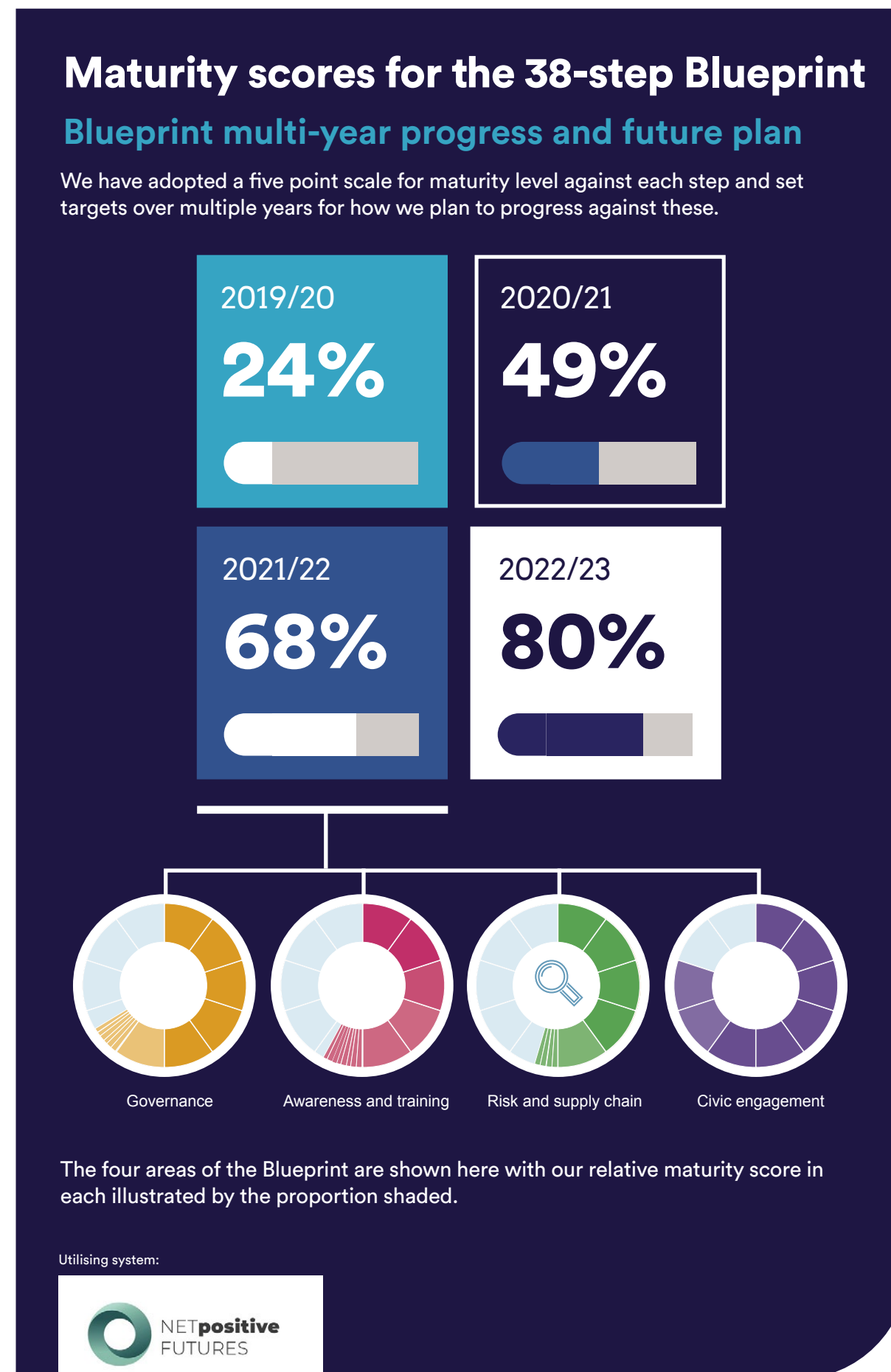
# Awareness and training
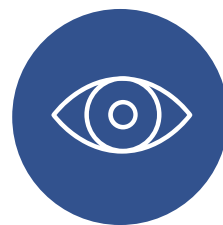
We have continued to develop our awareness and training programme through increased engagement across the university community, by expanding our training offer to an increasing number of front-line teams and through additional professional student degree programmes. This year we achieved the following:

✓ **We met our commitment to continue engaging across the university community about the goal of becoming a slavery-free campus and communicating our progress.** During the year we have presented multiple updates, a university-wide article on our blueprint progress, tweets from the main university account, and more local, targeted sessions for key stakeholders across Finance and Infrastructure.

✓ **As part of our annual training and awareness plan, multiple training sessions were delivered by the national Gangmasters and Labour Abuse Authority (GLAA), a UK-wide Non-Departmental Public Body, whose role is to protect vulnerable and exploited workers and in recognition of its wider partnership with the Rights Lab at the University of Nottingham.**

✓ The GLAA-led sessions were aimed at campus front-line workers. These are colleagues who are responsible for recruiting and managing operations and facilities workers and/or casual workers, who are at greater risk of exploitation, colleagues who may be able to spot the signs of modern slavery on campus during the performance of their roles in Security, Catering, and Estates, and colleagues working in student facing roles, for example, Student Services, Residential Experience, Counselling Services, and Students' Union, who may be able to spot the signs of labour and/or sexual exploitation amongst the student population. **Over 100 staff attended and this included representatives from Nottingham Trent University as an example of our Universities for Nottingham partnership.**

✓ For more specialised training, the Procurement Team have successfully completed modern slavery supply chain risk training via either HEPA or CIPS as part of the annual training plan for all Procurement staff undertaking tendering activities.

✓ **We continued our work to help enhance student education and training on modern slavery by including the topic in relevant professional degree programmes.** To date the university's curriculum included sessions on modern slavery and related forms of exploitation in the Business School, Medicine, and Social Work.

✓ **During 2021-22 we also confirmed the inclusion of modern slavery in three additional professional degree programmes led by the School of Health Sciences: Nursing, Midwifery, and Physiotherapy and Sport Rehabilitation.** Modern slavery is now being covered in all three programmes with Year 1 students in the Introduction to Safeguarding course and with Year 2 students in their sessions on domestic violence.

✓ Modern slavery is also now included in Fitness to Practice, Fitness to Study and Safeguarding sessions run by the Faculty of Medicine and Health Sciences Lead for Safeguarding and the School of Health Sciences Lead for Fitness to Practice and Lead for Fitness to Study. These sessions are provided on an ongoing basis (every six weeks) within Health Sciences for staff, as the staff in Health Sciences are themselves practitioners.

✓ In addition and building on past years of student engagement, including a campus-wide reading programme about modern slavery, **the Rights Lab hosted an extensive student placement scheme open to all degree programmes**. Dozens of students have completed placements with the Rights Lab on modern slavery topics, and have delivered new research, databases, reports, and impact.
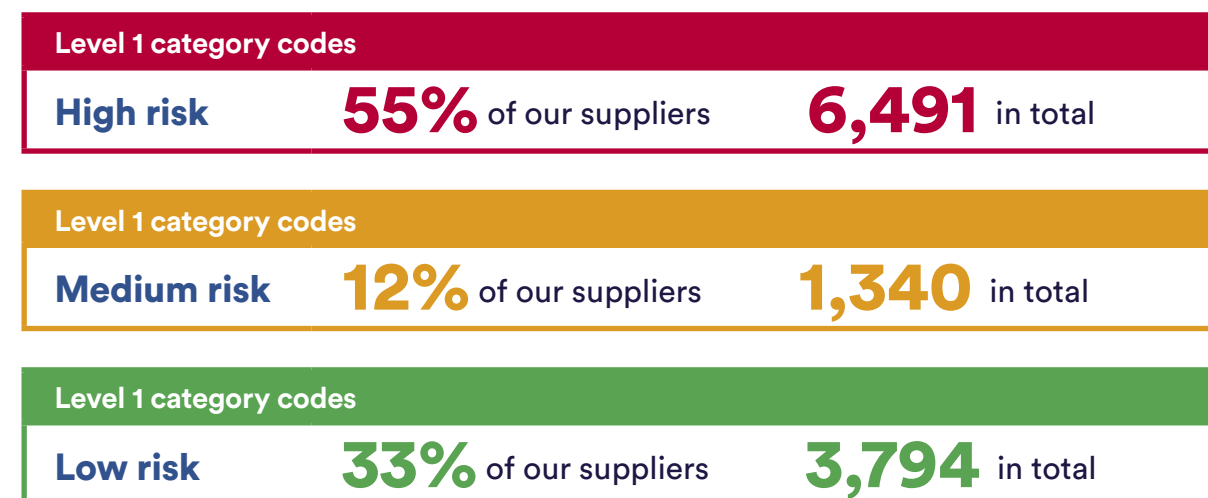
# Managing risk in the supply chain

**The university's Procurement team lead the deployment of the Blueprint into the way goods and services are procured, using a risk-based approach working in collaboration with experts in this field from the Rights Lab. The Procurement team launched pathfinder projects in 2020-21 to build modern slavery into large scale Laboratory Consumables and Construction projects (£10-28m). This year we have further enhanced our knowledge and capability to identify and action risk within the supply chain. This year we achieved the following:**
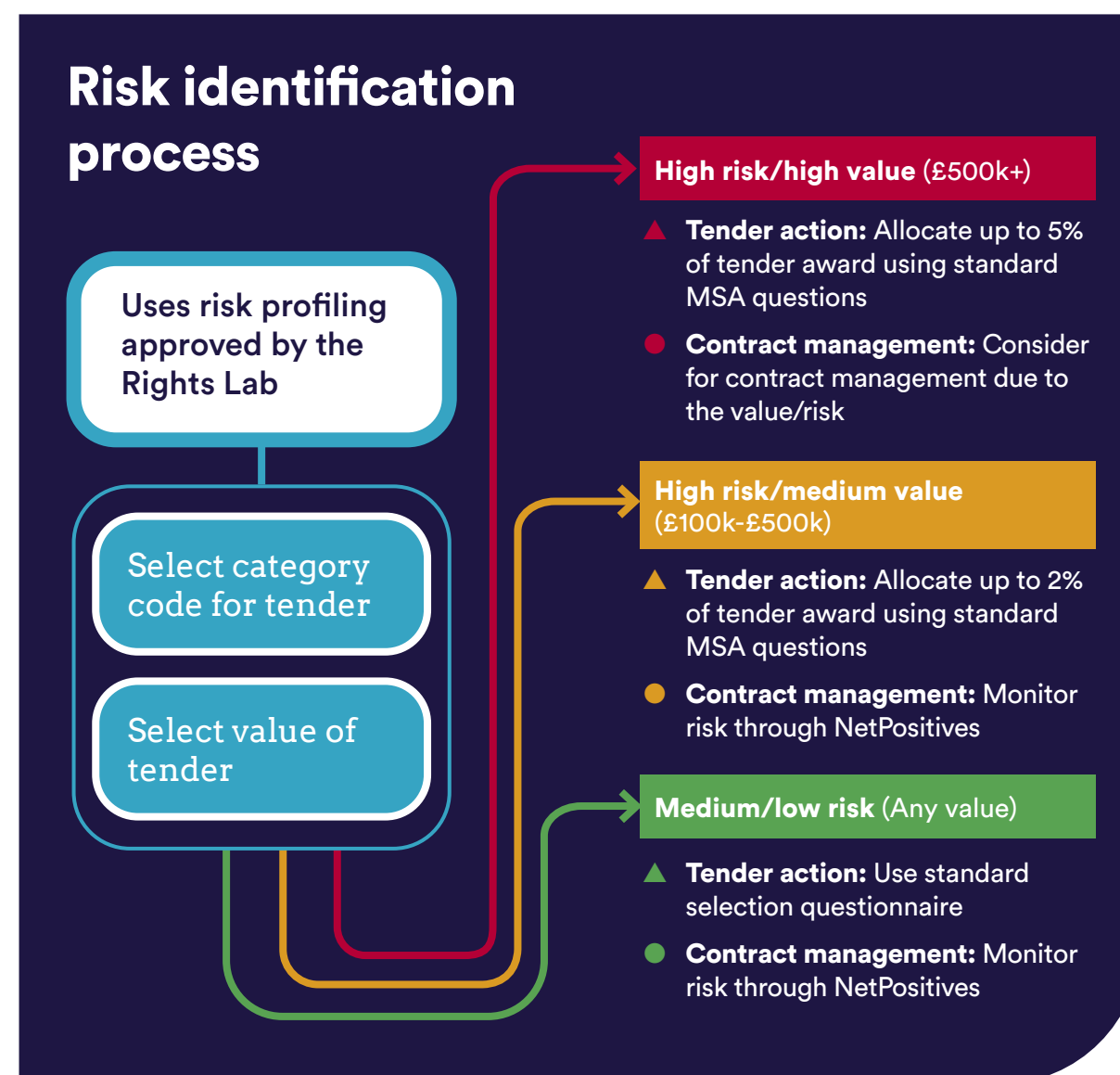
✓ **The university has updated its Procurement Policy to reflect its commitment to mitigating the risk of modern slavery in its supply chain, its ambition to be a slavery-free campus, and its on-going commitment to supporting the City of Nottingham to become a slavery-free city by 2030.**

✓ **The Procurement team has developed a Code of Conduct for all suppliers that explicitly references our ambition of being a slavery-free campus and secured approval from the university's Supplier Relationship Management (SRM) Board chaired by our Chief Financial Officer.** This code is integrated into all new procurements and will apply to all suppliers. Suppliers must provide acceptance as part of the tender process. The code will be introduced to existing managed suppliers as part of their regular review meetings.

✓ As part of the university's new SRM Programme, we have identified 18 Tier 1 suppliers. Of those, 16 are required to publish MSA statements of their own. **We undertook a desktop assessment of these 16 suppliers and benchmarked their MSA statements against the Know the Chain assessment criteria to inform an engagement plan. To date, we have directly engaged four of these Tier 1 suppliers in discussions to support the university's progress towards becoming a slavery-free campus. We will approach the remaining Tier 1 suppliers as they are onboarded into the SRM Programme and include modern slavery into planned reviews.**

✓ **We continue to assess our sources of supply for risk of modern slavery** – see figure 3 for the latest analysis based on 2020-21 spend data.

✓ **We have now developed and launched a modern slavery risk tool for the Procurement team to assess the risk within upcoming tenders – see figure 4. Where there is a high and medium risk, the tool provides questions to incorporate into the tender response document and a weighting to allocate as part of the contract award. Since the launch of this tool, 44 tenders have been run that incorporated the modern slavery questions, with 9 identified as high risk and 3 as medium risk across the categories of building refurbishments, cleaning services and research equipment.**

✓ Following on from our pathfinder projects in 2020-21, we have built modern slavery due diligence questions into the Estates Halls refurbishment programme, **this included the large-scale refurbishment of Florence Boot Hall as a slavery-free building project**. All food purchasing via the TUCO (The University Caterers Organisation) framework also now includes modern slavery specific questions. We have reviewed the TUCO policy and manage the risk for food supply chains via their framework.

✓ **We have conducted due diligence on all university branded merchandise** to confirm it is provided by pre-vetted suppliers. No risk has been identified in these procurement routes. We also have checked the graduation gown providers and confirmed they have a robust set of policies in place including a Code of Conduct and emphasis on their own suppliers' management of modern slavery risk further upstream in the supply chain.

**Figure 3: Understanding our suppliers – a summary of the 11,625 sources of supply* by category risk for 2020-21.**

| Level 1 category codes | | |
|---|---|---|
| **High risk** | **55%** of our suppliers | **6,491** in total |

| Level 1 category codes | | |
|---|---|---|
| **Medium risk** | **12%** of our suppliers | **1,340** in total |

| Level 1 category codes | | |
|---|---|---|
| **Low risk** | **33%** of our suppliers | **3,794** in total |

*Sources of supply is not the same as the unique number of suppliers used by the university.

**Figure 4: Modern slavery risk tool for tenders**

## Risk identification process

**Uses risk profiling approved by the Rights Lab**

**Select category code for tender**

**Select value of tender**

**High risk/high value** (£500k+)

▲ **Tender action:** Allocate up to 5% of tender award using standard MSA questions

● **Contract management:** Consider for contract management due to the value/risk

**High risk/medium value (£100k-£500k)**

▲ **Tender action:** Allocate up to 2% of tender award using standard MSA questions

● **Contract management:** Monitor risk through NetPositives

**Medium/low risk** (Any value)

▲ **Tender action:** Use standard selection questionnaire

● **Contract management:** Monitor risk through NetPositives

# Civic engagement

**Through the work of the university's Rights Lab and the Modern Slavery Act Working Group, we continue to drive our civic agenda and support partners and other organisations to build capability and approaches to understand and mitigate risk of modern slavery. This year we achieved the following:**

✓ The Midlands ARC (Anti-Slavery Research Collaboration) continues to grow and has held several consortium events and meetings this year. The Blueprint has been introduced to this network of 19 universities formally by the ARC's chair, Lord Vernon Coaker.

✓ **The Blueprint has inspired the formation and launch of a West Midlands Slavery Free Campus Alliance, with membership that includes the West Midlands Anti-Slavery Network Alliance, the University of Birmingham, Birmingham City University, and the Student Ambassador Network – a campaign and advocacy training programme for university students who want to lead on creating change on abuse, exploitation and human trafficking.**

✓ We have also been approached by local UK Councils and the Commonwealth Games to understand more about how we manage our slavery-free campus programme and to seek support on adapting it for local government and non-profit settings.

✓ In the public procurement field, we delivered an overview of the Blueprint and our work to date at a joint LUPC/SUPC Responsible Procurement event attended by university procurement professionals from across the UK. Key feedback from that session included: "A key to improving anything is benchmarking against a standard, your work on this framework is really great and will make a big difference."

✓ The Rights Lab delivered numerous locally-based and national talks and events, including introductions of the topic to new audiences. In one example, the Rights Lab Director highlighted the Slavery-Free Campus Blueprint as an indicator of anti-slavery progress in the past three years, at a live-streamed panel event at Scotland Yard featuring the Rights Lab, former Prime Minister Theresa May, and the UK Independent Anti-Slavery Commissioner, to mark the end of the Commissioner's term.

✓ **The Rights Lab is also now working with the UK Modern Slavery Training Delivery Group, hosted out of the Cabinet Office, to integrate the Blueprint and Slavery-Free Campus report findings into a new national report on university action to tackle modern slavery.**

✓ As part of that collaboration, it has presented findings from the Slavery-Free Campus report at a meeting and three workshops hosted by the UK Modern Slavery Training Delivery Group with police forces, PCCs, fire service, and local government, and university staff and students.

✓ **The Rights Lab is supporting the GLAA and the Skills and Education Group on a national roll-out of a new Level 1 Award in Workers' Rights and Labour Exploitation, which has been developed to raise awareness of the basic employment rights provided by UK law.** The Rights Lab also works on several research projects in partnership with the police, the National Crime Agency, and the GLAA, and leads multiple projects focused on improving the UK's support systems for survivors of modern slavery.

✓ **The university HR team and the Rights Lab are further supporting the GLAA with input on how universities can comply with the visa terms and conditions for sponsoring international students, as part of the GLAA's work nationally to respond to cases of international students identified as potential victims of modern slavery in the care sector.** The GLAA is deploying the university's Blueprint as part of its work tackling the problem of international student exploitation, including in presentations to the Home Office and HE/FE providers. The Blueprint was further highlighted in a media report about the trafficking of students on visas that drew from the GLAA's national investigations. The Observer article described our "blueprint to help universities tackle modern slavery, with recommendations including improved staff training and dedicated working groups" (*The Observer,* "Human traffickers 'using UK universities as cover'" (July 3, 2022, www.theguardian.com/law/2022/jul/03/human-traffickers-using-uk-universities-as-cover).

✓ The Rights Lab provides secretariat to the Nottingham and Nottinghamshire Modern Slavery Partnership, and works as a member of the Partnership. The local civic leadership of this group has enabled multi-sector work to raise public awareness, provide training for frontline staff, promote a slavery-free economy, and co-ordinate improved support services.

✓ Part of Nottingham's commitment to the detection and prevention of modern slavery is demonstrated in the Nottingham City Council's new Slavery Exploitation Team (SET), based in Community Protection. **As part of its work supporting the Partnership with SET, the Rights Lab also continues to deliver the Anti-Slavery Partnership Toolkit** (iasctoolkit.nottingham.ac.uk), which offers resources to help all of the UK's local modern slavery partnerships improve their responses.

✓ **Finally, our work on modern slavery was highly commended in the national Go Public Procurement awards in the Social Value category in May 2022.**

GO AWARDS
UK NATIONAL 2021/22
Celebrating Excellence in Public Procurement

HIGHLY COMMENDED

Social Value Award – Other Organisations

**University of Nottingham**

Grahame Steed
Chair, GO Awards Judging Panel

LONDON CONSTRUCTION PROGRAMME

# 3. Further steps 2022-23

The Working Group will continue to progress work guided by our Slavery-Free Campus Blueprint. In particular we will focus on the following areas.

## Governance

- We will continue to progress our maturity score on our Slavery-Free Campus Blueprint across the 38-steps and aim to improve our score from 68% to a level of 80%. We will work with Internal Audit to validate our approach.
- We will continue to expand our engagement with internal and external stakeholders to support our anti-slavery goals. We will work with Finance on opportunities to mitigate risk of modern slavery in our investment approach. We will further explore possibilities for adapting elements of the Blueprint for implementation at the university's international campuses.
- We will further develop our Modern Slavery dashboard to support collaboration with our suppliers – indicating where Modern Slavery has been discussed during supplier meetings and overall level of risk and engagement.
- We will continue to develop our university policies and procedures to ensure that modern slavery is referenced. HR will develop a formal recruitment policy which will include modern slavery and review all associated guidance and documents for recruiting managers.
- We will investigate how to incorporate requirements into the development of our new Digital Core (HR, Finance and Procurement system) that will support our anti-slavery work.

## Awareness and training

- We will continue to communicate internally to increase awareness and engagement with our work and publish an annual Campus News update on progress against the Blueprint.
- We will turn our existing training offer, for procurement, HR and front-line campus workers, into a single training plan that can be accessed online and year-round.
- We will continue to identify scope for supporting degree programmes to enhance student education and training on modern slavery, with a particular focus on professional degree programmes.

## Managing risk in the supply chain

- Our Procurement policy will be kept up to date with an annual review to ensure developments with our Slavery-Free Campus work are reflected as part of the university's approach to Responsible Procurement.
- We will run our annual assessment on our Procurement spend to understand the distribution of risk in our supply chain and to inform where we should focus due diligence as part of our modern slavery Procurement risk approach.

- Our Procurement team will continue the use of the Modern Slavery risk tool for every new procurement undertaken by the Procurement team to identify where and how modern slavery should be built into tender requirements.
- Our Code of Conduct that includes references to modern slavery will be a mandatory element of the supplier selection questionnaire for all new centrally procured contracts.
- We will continue to engage with our Tier 1 suppliers as they are onboarded onto our Supplier Relationship Management programme or as part of on-going reviews. We will be to outline our work on a Slavery-Free Campus, introduce our Code of Conduct and explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains that we may collaborate on.
- The Procurement team will investigate how they can make best use of the Electronics Watch relationship with the Southern Universities Purchasing Consortium.

## Civic engagement

- The Rights Lab will continue to collaborate in partnership with the GLAA, government and law enforcement bodies on tackling modern slavery, both locally and nationally.
- The Rights Lab will continue its involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership, including work to share learnings between local and campus approaches to becoming slavery-free communities.
- The Working Group will continue disseminating the Blueprint and slavery-free campus learning to the Midlands ARC participating universities, further building this regional network of campuses working to become slavery-free.
- We will support the finalisation and launch of a new national report on university action to tackle modern slavery, produced by the Cabinet Office-hosted UK Modern Slavery Training Delivery Group that will integrate the Blueprint and Slavery-Free Campus report findings.
- Members of the Rights Lab team will continue to deliver talks and presentations locally and nationally, including on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.

# 4. Approval and review

This Statement was approved by the University of Nottingham Council on 11 October 2022.

*Shearer West*

**President and Vice Chancellor, Professor Shearer West CBE**

Date: 11 October 2022.

# 5. Appendix 1 – 38 steps to a Slavery-Free Campus

**Take action for a Slavery-Free Campus – a Blueprint: 38 practical steps for universities to tackle modern slavery**

| Governance and management on campus | |
|---|---|
| **Leadership** | |
| **G1** | Assign accountability for addressing modern slavery and human trafficking to a Council or Board level. |
| **G2** | Form a Working Group to tackle modern slavery that includes staff from different and appropriate functions (for example, Procurement, HR, Estates). Assign operational responsibility/group leadership to an individual with the right skills, interests and influence. |
| **G3** | Working Group to discuss and initiate wider consultation on what the university wants to achieve in the area of preventing and ending modern slavery, for example, do we want to be a leader in our peer group, be a Slavery-Free Campus or meet basic legal and industry standards? Get agreement and commitment to university goals from Council/Board. |
| **G4** | Working Group to develop a map of the university's key internal and external stakeholders, including owned/partially owned subsidiaries and key partners, to understand who the university impacts through its operations and supply chain and who can support it in its antislavery goals. It is likely that all professional service departments will need to take responsibility for steps in the university's antislavery blueprint (Estates/Facilities; Finance; Procurement; Human Resources; Governance; Research). |
| **G5** | Working Group to develop an implementation plan for how to achieve the university's goals, setting clear objectives over time with clear ownership and required resources. |
| **G6** | Working Group to develop a Modern Slavery Dashboard containing key indicators of performance for own operations and supply chain towards the university goals to manage progress. Also to consider how to track and evaluate the effectiveness of actions taken in response to human rights risks. |
| **G7** | Working Group to lead on regular short-term reviews of progress towards its goals and to inform the annual, legally-required review and update of each university's Modern Slavery Statement. This should include progress against key performance indicators and the year-on-year improvement plan across processes and systems plus future commitments. Internal audit involved to bring rigour and challenge to the programme, key risks should be added to the university Risk Register. |
| **Policies** | |
| **G8** | University Governance to develop a university Ethical Framework defining the ethical standards that the University sets across all of its activities. This covers stakeholder engagement, research, business operations, donations and governance. The Modern Slavery and Human Trafficking Policy within this blueprint should reflect the ambition of the university as determined in G3. |
| **G9** | University Finance to review approach to investment to ensure their ethical investment or responsible investment policies include modern slavery. Consider being signatories of the United Nations Principles of Responsible Investment. |
| **G10** | University research services and fundraising departments to ensure that policies on research partnerships (including industry partnerships) and donors include work to ensure the university is not sending or receiving funds to and from external organisations that do not have risk mitigation in place. |
| **G11** | University HR to ensure recruitment policies set out the requirement to be aware of modern slavery in recruiting staff, and that the university mitigates slavery risk through checks on right to work in the UK. This includes via third parties as well as direct recruitment. |
| **G12** | University Procurement policy to reflect focus and ambition on reducing modern slavery risk in the supply chain as part of corporate social responsibility (CSR) approach. |
| **Procedures and management** | |
| **G13** | University HR and Student Services to actively support the safe migration of staff and students respectively via appropriate advice and monitoring of visas. |
| **G14** | Working Group to support the university to map and review existing university procedures and ensure that modern slavery is referenced and staff, students, suppliers and partners understand what steps they are responsible for. This should include staff guidance, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements. |
| **G15** | University HR to establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker's landlord's name and the worker's address. |
| **G16** | University HR to demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business. Establish regular checks of employees' and applicants' addresses for high occupancy of particular houses and act accordingly on the information. Check bank accounts to identify unrelated employees paid into one account; mobile phone numbers to identify seemingly unrelated employees who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated employees who are contactable through the same number. Act accordingly on the information for all these checks. |
| **G17** | University HR to demonstrate that complaints/grievance procedures are in place, issued to all staff and operated fairly and independently. |
| **G18** | University Registrar's Office to demonstrate that a whistleblowing procedure is in place whereby all staff can confidentially raise issues of concern to a member of the senior team without fear of retribution and there is a process for responding to complaints or reported violations. |
| **G19** | Working Group to develop channels for gathering and analysing future risk information from sources such as whistle-blower hotlines, community-facing grievance mechanisms and stakeholder engagement, including suppliers. Establish a process to disclose any issues and build improvement actions based on this data and risk assessment. |

| Awareness and training for staff and students | |
|---|---|
| T20 | Working Group to engage internally, communicating the university's goals for tackling modern slavery and updates on progress. |
| T21 | Working Group to have a process to make all new staff aware of modern slavery through an organised induction programme and to communicate changes in policies and procedures to staff, students, suppliers and partners. |
| T22 | Campus leaders on education (for example, PVC/APVCs) and Student Union to consider how to integrate the topic of modern slavery into student education and work with faculties/schools to include modern slavery in the syllabi of all front-line degree programmes. |
| T23 | Working Group to outline all relevant parties to inform an on-going awareness and training plan that should include at minimum procurement, senior management, human resources, and compliance officers. Training plan to include how to implement modern slavery policies, identify modern slavery in practice and report on incidents/concerns. |
| T24 | University Procurement to provide regular, specific training for their staff and conduct regular reviews of their procurement practices. |
| T25 | University HR to facilitate training of counselling staff, student tutors, hall wardens, campus security staff, 'nightline' volunteers and any other students or staff members who hold pastoral roles within the university to spot the signs that may indicate exploitation and ensure victims who come forward are given appropriate care. This training should be repeated annually. |
| T26 | University HR to ensure staff responsible for recruitment to the university's own operations and labour providers staff are trained on modern slavery policies and risk mitigation strategies. To include instructions to report and record where work-seekers are introduced by an individual claiming be a relative or friend but may be exerting control over the workers (for example, speaking for them or waiting while they are interviewed). |
| T27 | Working Group to support Student Union (SU) council on developing and approving new policies that examine the SU's own supply chains, ethical guidelines for suppliers, staff training and awareness-raising. |
| Managing risk in the supply chain | |
| S28 | University Procurement to establish an annual risk assessment to analyse where the greatest likelihood of slavery is within the organisation's operations and its supply chain, including subcontractors. Use this, along with spend analysis (indicates where we may have most influence) to prioritise where action is focused and apply due diligence to high-risk suppliers. Disclose priority areas for action. |
| S29 | University Procurement to develop a Supplier Code of Conduct that sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain in line with our standards. Use a Supplier Relationship Management Programme to complete an annual check that ensures all managed suppliers' MSA statements are up to date along with reporting of any known breaches either directly or within their supply chain. |

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| S30 | University Procurement to ensure the procurement process includes modern slavery in category strategies, with the particular risks of the category identified; tendering process, with specific requirements placed on the supplier when a high risk of modern slavery is present; contracts, with KPIs reflecting specific risks; supplier meetings and contract management. |
| S31 | University Procurement to review and amend procurement practices to ensure they do not exacerbate the risk of modern slavery, develop transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights. |
| S32 | University Procurement to ensure that all contracts for recruitment services contain the necessary complaints/grievance procedure, issued to all workers and operated fairly and independently. HR to ensure contractual obligations around MSA are monitored for all recruitment services. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers. Ensure the minimum wage is paid to all staff. |
| S33 | University Procurement and Supplier Relationship Managers to target high-risk areas on which to focus for additional supply chain analysis, for example product areas such as lab consumables or electronics or services such as catering or construction. Explore use of supplier social audits to evaluate risk and support suppliers to mitigate risk over time. |
| Civic and wider engagement | |
| C34 | Working Group to build networks and engage with organisations operating in the antislavery and labour exploitation arena and with areas such as Supply Chain risk (for example, Electronics Watch) to establish how external tools can be utilised within the university and its supply chain. |
| C35 | Working Group to work alongside university research centres and students to ensure the organisation is participating in and supporting the work of local antislavery multisector partnerships and local prevention programmes. This could include event hosting, support for training materials or website development, and support for front-line professionals in training, and monitoring and evaluation services. |
| C36 | Working Group to help the university develop a partnership approach to modern slavery in the local area with other local universities, to share best practice and work towards to goal of creating Slavery-Free Cities. |
| C37 | Working Group to support a university commitment to involving modern slavery survivor input and leadership in Slavery-Free Campus efforts, recognizing the value of the expertise of those with lived experience. |
| C38 | University campus life office to support and encourage student antislavery activities, including by student groups and unions, and where possible, invest in student-led programmes, an example being the campus-wide reading programme University of Nottingham (UoN) Against Slavery (2018-19). |

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