Canterbury Christ Church University

# Modern Slavery and Human Trafficking Statement 2020-21 Financial Year

The University is committed to ensuring that slavery and human trafficking is not taking place in its supply chain in line with the Modern Slavery Act 2015. As a values based institution, the University condemns morally bad practices and expects all of its business partners to live up to and adhere to the principles set out in the anti-slavery legislation. The actions taken by the University in this financial year to meet the objectives include:

- Oversight of the management of risks of modern slavery and human trafficking in the supply chain is provided by a nominated senior manager, the Pro Vice Chancellor (Research and Enterprise), as part of his role of chair of the Sustainability Strategic Management Group.
- A policy review is continuing, and where required, modifications are being made to ensure that all relevant University policies identify how they support compliance with the Modern Slavery Act. As part of this review the staff policy on Coercive Behaviour has been identified for further development before release in 2022. This policy will be underpinned with practices to support safeguarding and awareness of the indicators of Modern Slavery and Human Trafficking.
- Training and development in the application of all of the University's staff policies is in place and is monitored by the Human Resources and Organisational Development Department.
- The University makes use of the SUPC framework for many of the significant tender exercises. The SUPC has become affiliated with the Electronic Watch to ensure compliance with labour rights and safety standards in the supply chain. This is particularly relevant for the high risk supply of IT equipment and consumables.
- **The SUPC have released a statement**: "The SUPC is committed to acquiring goods and services for its members without causing harm to others. Affiliating to Electronics Watch is an important step forward, and will allow the SUPC to have eyes and ears on the ground in producer regions to ensure rights violations are detected and properly addressed."
- As part of the University's tender processes outside of the use of the SUPC framework a statement is obtained from the supplier confirming how they meet the requirements of the Modern Slavery Act 2015. If the goods or services being purchased have a high risk of labour rights violations (including but not limited to: clothing; IT equipment, and construction works) then additional questions to demonstrate compliance are raised as part of the tender process.
- The increased risk of Modern Slavery in the supply chain due to COVID 19 restrictions and the need to monitor health and safety in working practices for social distancing has highlighted the importance of due diligence checks of suppliers. The procurement team and purchasing managers across the institution recognise the heightened risk and are

completing thorough checks at the tender stage, prior to taking on any new suppliers, to help mitigate the risk.

- In support of these mitigating actions the University's Procurement team offers support and guidance to all areas of the University that engage with suppliers to procure goods and services, reporting any non-compliance of policy requirements to the relevant Senior Manager.
- The University's Governance and Legal Services team reviews contractual terms and conditions of all draft agreements to ensure provision is made relating to Modern Slavery Act compliance.
- The University's Modern Slavery and Human Trafficking Statement has support of the full Governing Body, and was presented for approval at the Governing Body meeting on 23 November 2021.

The Unitemps temporary staffing agency operates under franchise by the University's subsidiary. The agency falls outside of the scope of the modern slavery legislation, however, on a voluntary basis the agency complies with the requirements of the Modern Slavery Act. The actions taken by the staffing agency are monitored by the Branch Manager, and include:

- Client terms of engagement require the client to comply with the requirements of the Modern Slavery Act 2015.
- All external clients must comply with all applicable anti-slavery, forced and compulsory labour, and human trafficking laws, statutes and regulations in force.
- External clients must have and maintain their own policies and procedures to ensure compliance. These policies must give the client the power to enforce the conditions where appropriate.
- High risk areas for agency staff have been identified as any sector where a gang master's license is required, such as in agriculture. No Unitemps agency workers can be set assignments in these high risk sectors.

The University continues to expand its knowledge of the supply chain and works proactively with all managers, budget holders and staff engaged in procurement activity to build on their understanding of the requirements of the Modern Slavery Act. This forms part of the University ongoing commitment to ensuring all vulnerable staff, students and those working in the supply chain are safeguarded against exploitation in all forms.

**Approved and signed on 23 November 2021 by:**



**Professor Rama Thirunamachandran**
**Vice Chancellor**