Canterbury Christ Church University

Modern Slavery and Human Trafficking Statement 2021-22 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 the University is a values based institution, it 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 (SSMG).
- The University has now agreed and set two Key Performance Indicators as follows:
- KPI 1 - The University has set the target of 100% of the staff who are managing high risk categories of contracts will receive training on identifying and addressing Modern Slavery in supply chains.
- KPI 2 – The University has set the target of 100% of all suppliers who have been classified as providing high risk goods or services will have completed a Modern Slavery due diligence questionnaire.
- An implementation plan for the KPIs has been put in place, with seven steps to be achieved. Progressing the plan is being managed by the Procurement team. As at the end of the financial year, 31 July 2022, the Procurement team were able to confirm three of the seven steps in the plan had been completed and good progress was being made on the fourth step.

The action taken to implement the KPIs includes:

- A total of 42 contracts were identified and rated as high risk, based on the Higher Education Procurement Academy ratings.
- The HEPA Modern Slavery e-learning module to be made available to all relevant staff and the staff who manage contracts are being made aware of the need to complete this training. Risk assessments of contracts will be undertaken once the relevant managers have completed their training.
- The University is developing a Modern Slavery questionnaire to be issued to suppliers and contract managers are being advised on next steps in this process.
- The Sustainability Strategic Management Committee is responsible for the ongoing monitoring of the KPIs.

Other actions taken by the University include:

- The questions relating to Modern Slavery and Human Trafficking are included in the tender/due diligence process when contracting for services or goods identified as being high risk areas. In year this included the tender for laptop and desktop computers.
- A policy review is continuing, and modifications are being made to ensure that all relevant University policies identify how they support compliance with the Modern Slavery Act. As deemed necessary all policies will support practices of safeguarding and raise the 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 continues to use pre-negotiated framework agreements put in place by the Southern Universities Purchasing Committee (SUPC) for many of the significant tender exercises. SUPC is 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 areas such as the 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."*
- The University's Governance and Legal Services team reviews draft contractual terms and conditions prior to commitment 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 is presented for approval at the Governing Body meeting on 29 November 2022.

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 29 November 2022 by:

Rama

Professor Rama Thirunamachandran
Vice Chancellor