

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

The enactment of The Modern Slavery Act into UK law during March 2015 was a pivotal milestone in fulfilling the aims and aspirations to combat Slavery and Human Trafficking here in the UK. The legislation provided authorities and other agencies the legal power and framework required to offer protection and criminal consequences for people seeking to exploit others. The Act and its enforcement are a key pillar for building the structure for social justice within our society. This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes De Montfort University's Slavery and Human Trafficking Statement for the financial year ending 31 July 2024.

This Statement details De Montfort University's response to the Modern Slavery Act 2015 and offers an outline of key areas where Slavery and Human Trafficking are deemed a higher risk area for potential prevalence within the University's supply chain.

Organisational Structure

De Montfort University is a Higher Education Corporation established in accordance with the Education Reform Act 1988. We are a provider of education and research services and comprise four academic faculties:

- Business and Law,
- Health and Life Sciences,
- Computing, Engineering and Media,
- Arts, Design and Humanities,

together with a number of professional services directorates.

We have a global annual turnover of £260 million¹.

The University also has a subsidiary company, De Montfort Expertise Limited, through which its commercial activities are provided.

Collaboration and partnership working

The procurement function collaborates and shares best knowledge and practice with procurement representatives from other universities and public sector bodies.

Our supply chains

The University's supply chains are in the main captured within the following high-level category groupings:

- Estates (Hard and Soft Facilities Management) Works, Products and Services
- ICT equipment, products and services
- Professional Services

- Science, technical, engineering and medical equipment, products and services

Each of the category groups above have been considered and the following specific categories have been identified as having a higher potential susceptibility to Modern Slavery and Human Trafficking occurrence.

- Construction Works including any sub-contractors and supply chains.
- Estates; hard and soft facilities management services (such as maintenance, cleaning and security services)
- Food and catering
- ICT and Audio Visual (AV) equipment and products
- Laboratory and Personal Protective Equipment (PPE) supplies
- Clothing (promotional, sportswear and work wear)

Most of the University's demand for office supplies and laboratory consumables is fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia. A wide range of products are procured across all these categories, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. The Consortia requests many of the suppliers in these high-risk areas to commit to the Base Code of the Ethical Trading Initiative (ETI) and is working to persuade all suppliers in these categories to commit to the Base Code.

A significant proportion of the University's demand for ICT equipment and products, including parts and accessories is also fulfilled by means of using national and regional agreements made available by the Higher Education Purchasing Consortia/Crown Commercial Services. The Consortia supports the principles of and works closely with Electronics Watch and includes contract-monitoring clauses created by Electronics Watch in all relevant agreements awarded by the Consortia and used by the University.

In respect of Security Services, we require our Security Contractors to be fully compliant with the Private Security Industry Act 2001 and have either ISO 9001 and/or the Approved Contractor Scheme. Any labour provision or sub-contracting must be disclosed to the University. Checks will be completed by the University to confirm and ensure expected and required accreditation and practice.

Our policies on slavery and human trafficking

We are committed to avoiding and preventing modern slavery and human trafficking in our supply chains or in any part of our business. We have employment policies in place and codes of conduct, which have relevance to how this issue is addressed within our business by members of our staff.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls, to mitigate the risk of slavery and human trafficking taking place within the University in or our supply chains.

The University is continually working to improve its controls. Ensuring clear reference to modern slavery and human trafficking commitments within our procurement policies and procedures as well as the use of Crown Commercial Services standard document to undertake supplier selection.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have a zero-tolerance approach to slavery and human trafficking. To ensure that all suppliers and contractors in our supply chain comply with our values we have the following procedures in place:

- a. We have a procurement policy, which forms part of the University's Financial Regulations approved by the University's Finance and Performance Committee, and which all staff at the University are obliged to follow. This policy is supported by a range of documented procedures, template documents, checklists and procurement guidance which include key content supporting management of the risks relating to modern slavery and human trafficking.
- b. Controls are in place within policies and procedures, which ensure that the tendering process for new suppliers and contractors includes the provision and subsequent monitoring of compliance with the university's policies, including policies relating to slavery and human trafficking. Our supplier selection I questionnaire also includes two declarations developed by Crown Commercial Services relating to the Modern Slavery Act 2015.
- c. This is further supported by the University's terms and conditions of contract, which include provisions whereby contracts can be terminated should a contractor breach such policies.
- d. Similar provisions are also contained within Higher Education Purchasing Consortia (and other including Crown Commercial Services) framework agreements used by the university. If the University wished to use a framework agreement which did not contain such a protection, it would seek to include such a provision by negotiation.
- e. Procurement templates exist and are annually refined to support active contract management by the business/contract owner. As part of this work, templates exist for Service Level Agreements (SLA) and Contract review meetings to help create consistency in staff considerations of slavery and human trafficking, throughout the contract lifecycle.

Training

The Procurement function provisions a range of training material for the core procurement team and key internal stakeholders (such as those managing supplier relationships). This currently

includes seven online higher education sector e-learning modules including (i) a guide to modern slavery and (ii) protecting human rights in the supply chain, alongside a range of broad courses to upskill procurers and contract managers. Early reference to the right materials and content is key to ensuring that modern slavery risks are effectively identified and mitigated.

Actions taken during the reporting year (2023/24)

A sustainable procurement strategy is established and helps procurers understand key priorities for the University when undertaking procurement activity, such as ethically sourcing and reducing modern slavery, and supporting them in understanding their obligations prior to awarding contracts. Nine performance measures are defined within this strategy, including one focussed on Modern Slavery.

Additionally, the University has this year continued to utilise the Social Value Portal in partnership with the University of Leicester and Loughborough University. A set of 37 National Social Value Measures have been collectively agreed for suppliers bidding for our higher value contracts to focus their tender proposals on, incentivised by evaluation weightings. Within the thirty-seven agreed measures, the following two are specifically framed on the managing the risks of modern slavery within supply chains and addressing the impacts:

- NT3d: No. of full time equivalent (FTE) employees hired on the contract that are survivors of modern slavery.
- NT43: Initiatives taken throughout the local and global supply chain to strengthen the identification, monitoring, and reduction of risks of modern slavery and unethical work practices occurring in relation to the contract (i.e. supply chain mapping, staff training, contract management).

Through the Social Value Portal, appointed suppliers will be focussed on evidencing delivery of the commitments inherent in the social value proposals within their tenders.

Actions planned for the next reporting year (2024/25)

As part of the New Procurement Act 2023 implementation, we are going to train those who participate in Procurement and Contract Management in a range of Supplier Risk Management areas including Modern Slavery.

Training in Supplier Risk Management, including Modern Slavery awareness, offers significant benefits for organisation under the New Procurement Act 2023. First, it strengthens compliance, ensuring that procurement activities meet legal and ethical standards. By educating staff on identifying and managing risks associated with suppliers, the organization reduces exposure to potential legal penalties and reputational damage associated with non-compliance.

Second, it promotes sustainable and ethical procurement practices. Training helps staff recognize signs of unethical practices, including forced labour, within supply chains. This proactive approach builds trust with stakeholders and enhances the organization's reputation as a responsible entity.

Additionally, effective risk management contributes to the reliability and resilience of the supply chain. By identifying high-risk suppliers early, the organisation can mitigate supply disruptions and associated costs. Overall, this training empowers staff to make informed, ethical decisions, protecting the organisation's interests while aligning with broader social responsibility goals.

As approved by the Board of Governors on (date):

Signed by.....

Chair of the Board of Governors