UNIVERSITY OF CUMBRIA

STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

Year to July 2023

INTRODUCTION

This statement sets out the University of Cumbria's position on modern slavery, its understanding of the risks and implications, and the steps that it is taking that aim to mitigate the risks and ensure that slavery and human trafficking do not exist within the University or within its supply chains.

As a provider of Higher Education, the University of Cumbria recognises its responsibility to take a robust approach to slavery and human trafficking. In line with its mission statement and objectives, it is committed to acting ethically and with integrity in all its corporate and business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the University or its supply chains.

This statement relates to the financial year 2022/23.

1) Organisation's structure

The University of Cumbria is a Higher Education Institution based in the North West of England, with campuses in Carlisle, Ambleside, Lancaster and London. The University operates interests and activities from other smaller sites in the North West and elsewhere in the UK through partnership and collaboration arrangements with education providers and other organisations.

The University of Cumbria is a company limited by guarantee and an exempt charity.

The overall responsibility for the strategy and control of the University of Cumbria rests with the University Board. The Board approves budgets and expenditure, and determines the educational character and objectives of the institution, as well as ensuring the effective and efficient use of the University's resources. The Modern Slavery statement is reviewed annually by the University's Audit and Risk Committee and approved by the University's Board of Directors.

The strategic and operational management and day-to-day running of the University is the responsibility of the Vice Chancellor's Executive, under the leadership of the University Vice Chancellor. The Vice Chancellor reports to University Board through the Chair of the Board.

Within the Vice Chancellor's Executive, responsibility for Modern Slavery sits with the Deputy Vice Chancellor (Health, Environment & Innovation).

2) University of Cumbria policies, processes and procedures on slavery and human trafficking

The University has policies and procedures relating to anti-slavery and human trafficking embedded within its standard operational policies and procedures as well as stand-alone Anti-Slavery and Human Trafficking Policy & Procedures.

The University's Anti-Slavery and Human Trafficking Policy and Procedures reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place in our employment procedures or supply chains.

2.1) Recruitment of University Employees

Human Resources and Organisational Development are responsible for the oversight, management and risk assessment of the recruitment and appointment of University staff, under the leadership of the Director of People & Culture.

Policies, processes and procedures are in place to support the HR activities in order to:

- Mitigate the risk of slavery and human trafficking occurring within the University by ensuring full compliance with UK Visas and Immigration (UKVI) "right to work" checks.
- Monitor and address any emerging issues of concern.
- Protect those raising concerns about possible instances of slavery and human trafficking.
- Ensuring that those directly employed by the university are remunerated in line with the Living Wage Foundation rate.

Relevant University Policies, Processes and Procedures include:

- Staff Recruitment and Selection Policy Statement
- Code of Conduct for Employees
- Public Interest Disclosure (Whistleblowing)

These policies are available on our website.

The University may on occasion use agencies to provide temporary staff to support its operation and is dependent upon the agencies to have robust employment status and identification checks for the temporary workers who do not go through the University's own employment checks, to ensure compliance with the Modern Slavery Act.

2.2) University supply chains

The University's Procurement Team is responsible for the oversight, management and risk assessment of suppliers and contractors, reporting to the Director of Finance & Resources and Deputy Chief Operating Officer.

University supply chains include:

- Laboratory Consumables and Equipment
- Science and Medical Goods and Services
- Professional Services
- ICT Equipment and Services
- Estates Goods and Services
- Office Supplies and Services

2.2.1) Due diligence processes for slavery and human trafficking in supply chains

Processes and procedures are in place to undertake due diligence on potential high-risk suppliers and conduct regular reviews of existing suppliers in order to:

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

Modern slavery risks are considered at all pre-tender discussions. We then seek to reduce the risks through the requirements of the tender.

Currently the University spends approximately 25% (monetary value) through consortia frameworks including the North West Universities Purchasing Consortium (NWUPC), which is itself is a member of Procurement England Ltd (PEL) and UK Universities Procurement Consortia (UKUPC), bodies dedicated to improving both the quality of procurement and the level of collaborative procurement across the HE sector. NWUPC

are committed to working with their suppliers to remove modern slavery from their supply chains. Included in this work they are collating information prior to tender award on first and second tier supply chain and then working with the suppliers post contract to encourage them to look beyond their statements and conduct robust analysis of their supply chains to identify areas of risk. Following this they will be working with them to see how they are dealing with this risk and what assurances can be implemented to redress this.

NWUPC is also a member of Electronics Watch, giving the University affiliate membership. Electronics Watch is an independent monitoring organisation, bringing together public sector buyers with experts in human rights and global supply chains. Their mission is to help public sector organisations work together and collaborate with civil society monitors in production regions to protect the rights of workers in their electronics supply chain.

2.2.2) New suppliers

Appointment of new suppliers takes account of:

- Identifiable risks associated with a particular product or geographical area of origin;
- The general reputation of the supplier in terms of slavery and human trafficking risks;
- Drawing the supplier's attention to obligations within the contract with regard to slavery and human trafficking.

2.2.3) Review of suppliers and adherence to University values

The University exercises zero tolerance to slavery and human trafficking. To ensure all those in the University's supply chain comply with University values, provisions to ensure supplier compliance are in place, including:

- For all new tendered contracts, we require suppliers to confirm compliance with the annual reporting requirements of section 54 of the Modern Slavery Act 2015.
- All suppliers are encouraged to register with the University's sustainability tool, 'Net Positive', to ensure that they comply with anti-slavery and human trafficking legislation or to provide other evidence to support their commitment.
- All high risk suppliers are expected to complete an Action Plan using the Net Positive Tool if they are not required to complete their own Modern Slavery statement.
- The University will work with all high risk suppliers to ensure they are compliant with anti-slavery and human trafficking legislation.
- All suppliers will be monitored and any concerns discussed with the supplier through the supplier contract management process.

3) Risk Assessment and High Risk Activities

The University has identified the following activities as high risk in terms of slavery and human trafficking:

- Employment of non-UK nationals on foreign visas
- Staff and Students who are emotionally or financially vulnerable
- Overseas suppliers
- Suppliers with whom the University has no previous history or knowledge
- Suppliers of goods in areas carrying material risks, including:
    - Office supplies
    - Laboratory consumables

- ICT and AV equipment
- Some estates services such as cleaning and security services.

The University also has an active risk register to identify the key areas of risk to the University and prioritise actions to reduce the risk.

4) Training and Awareness Raising

To ensure a high level of institution-wide understanding of the risks of modern slavery and human trafficking in University business and supply chains, the University is committed to delivering training to targeted staff including contract managers and HR staff.

5) Actions

Key actions undertaken in 2022/23 include:

- The University has signed up to Net Positive, and the action plan will be developed in the coming year.
- The University has updated its Slavery and Human Trafficking policy to include students as a potential at risk group. The procedures have also been updated to reflect this change, and in recognition of taking a more holistic approach the Safeguarding Policy has been updated to include Modern Slavery and oversight of the Modern Slavery policy and procedures is included within the Terms of Reference of the Safeguarding Steering Group
- Further awareness raising training for the University's senior leadership
- Improved signposting, through the inclusion of reference to the University's approach in our 2021/22 Annual Report.

The University has an action plan to drive further improvements through 2023/24.

6) Approval and Signature

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the University Board of Directors. It constitutes the University of Cumbria's Slavery and Human Trafficking Statement for the financial year ending 31st July 2023.



Signed by: Martin Williams

Designation: Chair of the Board of Directors, University of Cumbria
Date: 28 November 2023