University of Cumbria

Modern Slavery Act Statement

Financial Year 2023/24
(1 August 2023 to 31 July 2024)

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University of Cumbria's Slavery and Human Trafficking Statement for the financial year ending 31 July 2024.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement provides information about the University and its policy and practices to prevent modern slavery in its business and supply chains.

Organisational structure

The University of Cumbria is a UK Higher Education Institution providing a wide range of teaching, research and related activities. We have campuses in Carlisle, Ambleside, Lancaster and London and are developing a campus in Barrow. The University operates from other sites in the UK and overseas through partnership and collaboration arrangements with education providers and other organisations.

The University of Cumbria is a company limited by guarantee and a registered charity. We had income of £78.3m and over 10,000 registered students in 2023/24.

The overall responsibility for the strategy and control of the University of Cumbria rests with the University's Board of Directors. As part of their oversight of the University's approach to preventing modern slavery, they review and approve a Modern Slavery statement each year, following scrutiny by the University's Audit and Risk Committee.

Policies, processes and procedures on slavery and human trafficking

The University is committed to combatting slavery and human trafficking in all its business practices. We have established a formal Anti-Slavery and Human Trafficking Policy and Procedure which sets out our approach to this and have ensured that this approach is embedded across related policies and procedures and that it has a focus on our staff, supply chain and students.

Staff

The People and Culture team at the University are responsible for the recruitment, appointment and well-being of University staff, under the leadership of the Director of People and Culture. They provide oversight, management and risk management across a range of policies, processes and procedures which act to ensure that modern slavery related risks are mitigated, including through:

- Ensuring full compliance with UK Visas and Immigration (UKVI) "right to work" checks
- Ensuring that those directly employed by the University are remunerated in line with the Living Wage Foundation rate.
- Monitoring and addressing any emerging issues of concern.
- Protecting those raising concerns about possible instances of slavery and human trafficking.

The University may on occasion use agencies to provide temporary staff or may sub-contract some activities. In such cases, the suppliers of these services are required to conduct requisite employment checks and demonstrate compliance with duties under the Modern Slavery Act.

Supply Chain

The requirement to act ethically and safeguard human rights in the supply chain forms part of our Procurement Policy and we manage expenditure robustly in line with this policy. The University purchases a wide range of goods and services and we are committed to enforcing effective controls to minimise the risk of modern slavery taking place.

During procurement exercises, potential modern slavery risks are identified and a due diligence approach adopted. Suppliers are asked to provide evidence for review that demonstrates adherence to anti-slavery principles and practices and to the requirements of the Modern Slavery Act. All suppliers are encouraged to register with the NETpositive Supplier Engagement (HE) Tool, allowing the University to access data regarding the supplier's approach in this area, including within their supply chain, and to review and discuss their action plans.

There is added scrutiny of suppliers which provide goods or services that are deemed to be "higher risk" in terms of the potential for modern slavery to occur. Our risk assessment of the supplier base was updated in 2023/24 and identified the following categories of expenditure as being "higher risk":

- Security Services
- Hospitality and Catering
- Information Communication and Technology Equipment and Services
- Consumables and equipment
- Cleaning
- Construction and maintenance
- Clothing

The University's use of procurement frameworks helps mitigate key modern slavery risks and provides assurance to the University of supplier compliance. The University conducts much of this procurement via the North-West Universities Purchasing Consortium (NWUPC), who act to collate information prior to tender award on first and second tier supply chain and then work with suppliers post contract to encourage them to look beyond their statements and conduct robust analysis of their supply chains to identify areas of risk and the actions they are taking in mitigation.

Students

The University ensures that modern slavery risks to our students are considered as part of our wider approach to the Safeguarding, with a specific focus on this area within our Safeguarding and Prevent Policy. In order to ensure an ongoing focus on such risks, the University's operational lead for modern slavery is a member of the Safeguarding Steering Group.

Training and Awareness Raising

The University is committed to awareness raising and training in this area. In the current year, this has included the completion of a training course provided by the

British Universities Finance Director's Group by the procurement team and other key staff and a University wide message which explained what modern slavery is, made clear the University's approach and requested all staff to view a short video which explored the major indicators that it may be taking place. This was issued to coincide with Anti-Slavery Day in October.

Actions

During the current year, we have completed the following key actions to further develop our approach to modern slavery:

- Reviewed and updated the University's modern slavery risk register, with senior leaders responsible for staffing, supply chain and student welfare engaged to ensure coverage and actions across all areas of operations.

- Reviewed and updated the supplier risk register, identifying categories of higher risk suppliers.

- Included fuller emphasis on modern slavery risks and mitigating actions within the updated Procurement Policy.

During 2024/25, we will:

- Audit a sample of existing "higher risk" suppliers to receive assurance of continued compliance with the Modern Slavery Act and the operation of appropriate controls and mitigations.

- Review our approach to suppliers of lower value contracts which are not subject to formal tendering processes.

- Review our supplier contracts to ensure that we clearly outline requirements of suppliers in the area of modern slavery, including around their supply chain.

- Develop student focussed awareness raising campaign, highlighting what modern slavery is, how to spot indicators of concern, and how to access support for themselves or others.

Approval



Signed by: Martin Williams

Designation: Chair of the Board of Directors, University of Cumbria
Date: November 2024