

Modern Slavery Statement

Financial Year: **Year ending 31 July 2018**

Introduction

Bucks New University recognises that modern slavery is a crime resulting in an abhorrent abuse of human rights and includes slavery, servitude, forced or compulsory labour, and human trafficking. We are committed to protecting and respecting human rights and to ensuring that slavery and human trafficking is not taking place within our organisation, its subsidiary companies, or in any of our supply chains.

This statement is made pursuant to Section 54, Part 1 of the Modern Slavery Act 2015 to prepare a slavery and human trafficking statement for each financial year of the organisation and to set out the steps taken during the particular financial year to ensure that slavery and human trafficking is not taking place in any part of its own business or in any of its supply chains.

The University's structure, business and its supply chains

Bucks New University is a new generation university established in accordance with the Education Reform Act 1988 as amended by the Further and Higher Education Act 1992. We are an exempt charity by virtue of the Charities Act 2011, and subject to regulation by the Office for Students (OfS). Our core business is the provision of education and sharing of knowledge; and our vision is to be a leading University for professional and creative education and applied research. In terms of our widening participation and outreach activities we also work with a range of national and educational partners under formalised partnership arrangements.

The University is structured into seven Academic Schools (Art, Design and Practice; Aviation and Security; Business, Law and Computing; Media and Creative Industries; Health Care and Social Work; Human and Social Sciences; and Nursing and Allied Health). Schools are supported by a number of central service directorates to support our academic programmes and provide professional services. The University has a wholly owned subsidiary company, Missenden Abbey, which provides a centre for adult education, conferences and management training. It also jointly owns Buckinghamshire Education, Skills and Training (BEST) with the Buckinghamshire College Group.

We formally recognise two trade union bodies to represent our employees. The University and College Union (UCU) covers members of academic staff; while Unison covers professional service employees. The University works with representatives of both trades unions to negotiate and discuss terms and conditions of employment, relevant employment policies and procedures, and working conditions.

Our supply chains broadly fall within the following 'top-level' categories:

- Estates and facilities management (work, services and goods)
- ICT equipment and services
- Professional services
- Teaching materials

The principal areas that carry material risks in relation to modern slavery and human trafficking are office supplies, laboratory consumables, ICT and AV equipment and some estates and facilities management services.

Policies and procedures

The University is committed to endeavouring to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business. It already has in place a framework comprising core values, policies and processes that demonstrate its commitment to acting ethically and with integrity in its business relationships. The University will continue to keep this framework under review, together with its procurement and supplier management procedures, to assess their effectiveness in identifying and tackling human trafficking and modern slavery issues and refine where relevant.

All our policies, procedures and regulations can be found on our [website](#). Any employee found to have been acting in breach of our stated policies can be subject to our *Employee Disciplinary Procedures*.

People working on our campuses

Our **Human Resources** policies support employees, our core values as a university, and the ***Code of Conduct sets out our expectations of employees in relation to standards of behaviour, professionalism and commitment***. Our *Dignity at Work* policy ensures that each individual within the University has the right to be treated with respect, while our *Raising Issues of Concern (Whistleblowing)* policy allows employees to disclose information without fear of penalty which they believe shows malpractice or illegal practices in the workplace. If any incidences of modern slavery or human trafficking were to be suspected on site it is essential these are reported. Employees can report it to the University in confidence and anonymously;

- Report to University management
- Tell their Heads of Schools/Directorate leads, line manager or supervisors
- Tell the Human Resources team or through email whistleblowing@bucks.ac.uk
- Report to the Procurement team

Any staff that are sub-contracted to work on our campus can report this to their line manager or supervisor in line with their organisation's policies and procedures.

We have robust recruitment and induction processes for all new and current employees and this covers key people policies and procedures of the University.

Remedying violations

If actual instances of modern slavery, human trafficking or any other human rights violation are identified in the supply chain or on-site relating to staff, law enforcement can be involved to redress the harm to the victims and provide better options for the future.

If it is suspected that someone is being exploited, the following contact numbers are 01494522141:

- 999 if there is immediate risk of harm
- 101 Police
- 08000 121 700 Modern Slavery Helpline

Supply chains

Our **Finance** policies and regulations provide control over use of the University's resources and provide Council, our governing body, with assurance that resources are being properly applied and appropriate controls are in place. In particular, our *Procurement Procedure* sets out the processes whereby we acquire goods, services and works.

Due diligence and risk assessment

Procurement work closely with other university and we are a member of the Southern Universities Purchasing Consortium (SUPC). SUPC publishes its own [Modern Slavery Statement](#) and has registered with the TISC report website as a demonstration of its commitment to eradicating Modern Slavery throughout the supply chains supporting higher education. SUPC is also in turn a member of Procurement England Limited (PEL), the share vehicle by which English higher education purchasing consortia manage joint developmental and improvement projects for collaborative procurement in our sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all PEL member consortia are committed. This policy contains steps that form part of the supplier selection for the major contract procurement processes that are conducted for the consortium members.

Estates

Our Facilities Management Services contract ensures that employees under the contract are all subject to the National Living Wage. This covers cleaning, security, maintenance, pest control and business support services. As we proceed to re-tender our maintenance contracts, an element of Modern Slavery Act 2015 Requirements as a Pass/Fail has been introduced to this process as a criteria for evaluation.

ICT Equipment and Services

We have directed more spend for ICT equipment and services via the SUPC frameworks.

SUPC leads in the procurement of servers and storage equipment as well as IT-related parts and accessories for UK higher education institutions and other members. They also play an active part in the management of supply agreements led by sister consortia for Apple products, desktop computers and notebooks and other ICT equipment.

SUPC supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. The Electronics Watch contract monitoring clauses are included in relevant agreements that are awarded. During early 2017 Electronics Watch reviews and audits have been conducted at factories operated by sub-contractors to suppliers including Apple, Dell and HP in China, India and the Czech Republic.

Professional Services relating to Temporary Recruitment via agencies

We have directed more spend via the Temporary Recruitment framework agreements for temporary recruitment for corporate positions.

Training

We aim to deliver mandatory training relating to Modern Slavery for all professionals across the organisation who engage with suppliers and contracts. This will be a formal training delivered via an e-portal. A more informal training will be available for remaining employees via an alternative e-portal. The intention is to raise awareness and educate our employees about Modern Slavery and our Corporate Social Responsibility regarding this issue.

Further actions and goals

For 2017-18, we have increased the amount of spend via the frameworks from £950k to £1.9m. However, this represents a fraction of the non-pay spend for the university. We will continue to deliver more recruitment via a formal framework route.

The University follows a devolved procurement structure. The aim is to reduce the number of engagements and spend whereby little or no due diligence has been undertaken with suppliers prior to contract acceptance and implementation. This will be tackled with further education and training of procurement processes. The Procurement Procedure is being rolled out detailing the needs for diligence.

Following the training, staff will be empowered to undertake assessments of Modern Slavery for prospective suppliers as part of the due diligence.

Modern Slavery will be added to the risk register to ensure that processes are monitored at regular intervals.

A longer term view on processes for Modern Slavery will be undertaken in relation to partnerships and educational training organisations that we work alongside. Raising awareness internally in the first instance will enable us to address our wider participation.

Date of approval: 1st April 2019

A handwritten signature in black ink, appearing to read 'Nick Braisby', with a small mark above the 'i' in 'Braisby'.

Signature:

Professor Nick Braisby

Vice-Chancellor