

Modern Slavery and Human Trafficking Annual Statement 2024

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MODERN SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st July 2024. This is our ninth statement under the Act and provides an overview of our continuing progress in this area.

About the University

UWE Bristol and its subsidiary companies provide a wide range of education, research and training related activities. We are based in Bristol but are a global institution. We have approximately 42,600 students registered on courses in the UK and at partner organisations across the world. We employ over 4,700 people and have a turnover in excess of £400m and in 2023/24 we engaged with over 3355 suppliers.

We also play a leading role in shaping local decisions, improving lives across our communities and boosting the economy and cultural vibrancy of the city-region. More information about UWE Bristol is available here: www.uwe.ac.uk.

Our commitment

UWE Bristol has adopted a zero-tolerance approach to modern slavery and human trafficking and we are committed to ensuring our policies and procedures combat the risks of this occurring throughout our activities and in our supply chain. In doing so we have used the British Standard for organizational responses to modern slavery to inform review of our practices and further developments.

We continue to take both an informed and risk-based approach to better understand our diverse and complex supply chains and to prioritise and target our actions.

Our policies and procedures

Overall responsibility for modern slavery rests with the Board of Governors. Day-to-day responsibility for implementing and monitoring the University's approach has been delegated to the Chief of Staff and Clerk to the Board of Governors and the Chief Financial Officer.

Our policies and procedures ensure that the University is fulfilling its commitment to a zero-tolerance approach and that our activities are conducted ethically and with integrity. These include, but are not limited to:

- Human resources, recruitment and employment policies and procedures, which comply with UK law and are designed to ensure that all prospective employees are legally entitled to work in the UK, and to safeguard employees from any abuse or coercion once in our employment.
- Responsible Procurement Policy, setting out our commitments and expectations.
- Ethical Investment Policy, to ensure that investments made by the University are socially responsible and sustainable.

- Safeguarding Policy and Procedure, to protect children and vulnerable adults from abuse and neglect.
- Health and Safety Policy, to provide an inherently safe and healthy working and learning environment that engages the entire university community.
- Whistleblowing and Public Disclosure Policy and Procedure, to allow staff, students and all members of the University to raise, at a high level, concerns or information which they believe in good faith provides evidence of malpractice or impropriety.

The University also has a Modern Slavery and Human Trafficking Policy in place to support our annual statements and to ensure clarity on the University's expectations, where responsibilities sit and where any concerns should be raised. The policy was reviewed through the University's Sustainability Executive Committee, ensuring student engagement.

In 2023/24 the University's revised corporate ethics policy, including our anti modern slavery and human trafficking commitments, was approved by the University's new Ethics and Integrity Committee.

The University has held Fairtrade status since 2006, with reaccreditation achieved in July 2022, and has shared good practice and gained external recognition for its work on Fairtrade.

The University has applied the Living Wage Foundation's UK Real Living Wage since 2015 and is a Living Wage Employer through the Foundation's accreditation, awarding the University the mark of a responsible employer.

We are committed to transparency in what we do and expect the same from our contractors, suppliers and other business partners and their supply chains. With this in mind, we are part of TISC Report (<http://tiscreport.org>) the world's largest open data repository of Modern Slavery and Human Trafficking Statements and our Modern Slavery and Human Trafficking Statement is included on the UK Government's Modern Slavery Statement Registry.

Understanding and engaging with our supply chains

We work with a wide range of different suppliers and partners and purchase works, goods and services from more than 3355 suppliers listed on our Finance system. Some of our suppliers subcontract work or rely on recruitment agencies to supply temporary or permanent staff. By the nature of their businesses, some of our suppliers are potentially higher risk than others, for example: maintenance, repairs and construction companies. All our suppliers are commodity coded, enabling us to identify those who are most high risk.

Our supply chains include:

- Estates goods and services (including cleaning and security).
- Professional Services.
- Science, technical, engineering and medical goods and services.
- IT equipment and services (for which Government Procurement Frameworks are used when choosing and appointing suppliers).
- Library.
- Recruitment and delivery partners.

Notably, the University is aware that construction projects introduce risk in the supply chain, therefore modern slavery is referenced as part of the University's Sustainable Procurement Policy. The University is also progressing a significant piece of work to adopt a new operating model, with adjustments to the business models used by the University creating the potential for increased risk.

The University's requirements and expectations with respect to human rights, employee health and safety and environmental performance are regularly communicated to our suppliers and are referenced in tender documentation and contracts.

Our Supplier Code of Conduct sets out UWE Bristol's expectations, including that *'Suppliers must take reasonable and proportionate steps to ensure that their suppliers and sub-contractors are not engaged in slavery, servitude, forced and compulsory labour or human trafficking. Suppliers must be prepared to provide to us the names and geographical locations of their own suppliers, to the extent that these are the source of products supplied to us.'*

Our expectations are also included in the University's Terms and Conditions of Purchase, and where appropriate progressed at scheduled contract review meetings as part of Equality, Diversity and Inclusion.

Both are published on the University's website, providing information for suppliers:

<https://www.uwe.ac.uk/about/services/finance-services/supplier-documents>

Tenderers responding to a UK Procurement Regulations tender are also asked to comply with the International Labour Organisation (ILO), which is an internationally recognised code of labour practice.

The University proactively engages with its suppliers and hosted its annual SME Supplier event in person in October 2023, with approximately 200 registered suppliers. The University is also an early adopter of the MSA toolkit and has issued this to all of the University's suppliers over £40k. The University's top suppliers are listed in UWE Bristol's Annual Procurement Report which is considered by the Board of Governors Audit, Risk and Assurance Committee. We will also begin to promote Unseen, a Bristol based modern slavery & exploitation helpline [About Modern Slavery - Unseen \(unseenuk.org\)](https://www.unseenuk.org), to our supply chain.

Anti-Modern Slavery and Human Trafficking commitments are also included in the employment contracts of the international agents who recruit students to UWE Bristol, and in 2023/24 the University signed up to the UUKI Agent's Quality Framework, and further strengthened its approach to due diligence for academic agreements. The University is managing the increasing risk generated through the expansion in international partnerships, through its relationships with partners, frequent visits and direct engagements with students, and UWE Project Support staff.

The University is also aware of media reports of suspected victims of human trafficking being brought to the UK on student visas at other universities. The University continues to monitor the attendance of students and will raise staff awareness of the importance of doing so for the reasons of preventing modern slavery and human trafficking at the start of each academic year.

In 2023/24 the University's modern slavery and human trafficking risks were further integrated with the University's overall risk management framework.

UWE Bristol also continues to push this important agenda more widely, publishing research with the Universities of Bath and Sussex, urging the UK government to tighten the public sector tendering process to fight modern slavery, as companies that have failed to address known cases of modern slavery were found to be winning public sector contracts in the UK and could not be disqualified from the public tendering process due to weak legislation. The research, which explores the links between climate change and modern slavery, was also shared at the Bath and North East Somerset Partners in Procurement supplier day.

Promoting awareness and training

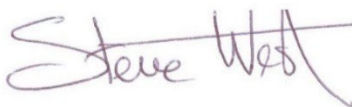
Raising staff awareness of the problem of modern slavery and human trafficking remains a priority in 2024/25. Communication of this Statement, the University's Modern Slavery and Human Trafficking Policy, and available training, is shared with all staff annually in the autumn, to coincide with Anti-Slavery Day. In 2024/25 we will also use this opportunity to promote the support provided through Unseen, a UK charity supporting survivors of trafficking and modern slavery.

In 2023/24 the University used the introduction of its new University Ethics and Integrity Committee to further promote this ethical value-base and will continue to do so in 2024/25. The Statement is also considered through the University's Sustainability Executive Committee ensuring student engagement.

Online training is available to all staff and signposted through the University's safeguarding training. The training module is also accessible to senior staff in the University's Malaysia Office and in 2023/24 was made mandatory for the University's Board of Governors.

The University is progressing a KPI of a 100% completion rate for staff with purchasing authority to undertake the training. Performance in 2023/24 was 47%.

Statement approved by the Board of Governors on 24 September 2024.



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Professor Sir Steven West

Vice-Chancellor, President and Chief Executive Officer
24 September 2024