Modern Slavery and Human Trafficking Annual Statement 2022
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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 2022. This is our seventh statement under the Act and provides an overview of our continuing progress in this area.

About the University
UWE Bristol (and its subsidiary companies) provides a wide range of education, research and training related activities. We are based in Bristol but are a global institution. We have approximately 38,800 students registered on courses in the UK and at partner organisations across the world. We employ over 4,100 people and have a turnover in excess of £377m. We continue to progress an ambitious investment programme, with £600m committed to delivery of our Strategy 2030 across our people, estate and infrastructure, and in 2021/22 we engaged with over 3500 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.

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.
- Public Disclosure Policy and Procedure (Whistleblowing), 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.

In 2021/22, the University’s zero-tolerance approach was added to the Agency Worker, Fixed Term Contract and Recruitment Policies.

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, in line with the University’s Public Disclosure (Whistleblowing) Policy and Procedure. This was reviewed through the University’s Sustainability Board, ensuring student engagement.

In 2022/23 we will be undertaking a review of our corporate ethics policy and ensuring our Modern Slavery and Human Trafficking commitments are included appropriately.

The University has held Fairtrade status since 2006, with reaccreditation achieved in July 2022, and has shared good practice and gained external recognition in the form of success at the South West Fairtrade Business awards and the Environmental Universities and Colleges Green Gown awards in the Food and Drink category for our work on Fairtrade.

The University has applied the Living Wage Foundation’s UK Real Living Wage since 2015 and we are 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 3500 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 progressing a large-scale student accommodation project, the largest Passivhaus student accommodation in the world. The University is aware that a project of this size introduces risk in the supply chain and has worked with the contractor on their supplier day held at the University, where modern slavery was referenced as part of the presentation of the University Sustainable Procurement Policy.

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 online in 2021/22, reaching over 200 suppliers.

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.

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 2022/23 we will be further considering our approach to academic agreements to ensure these commitments are appropriately reflected. The University is working to manage the increasing risk generated through the expansion in international partnerships, noting new partnership delivery commencing in China in 2022/23.

The University is also aware of recent 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 the 2022/23 academic year.

**Promoting awareness and training**

Raising staff awareness of the problem of modern slavery and human trafficking remains a priority in 2022/23. 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. The Statement is also considered through the University’s Sustainability Board ensuring student engagement.

Online training is available to all staff and signposted through the University’s safeguarding training. The training module has also been made accessible to senior staff in the University’s Malaysia Office.

The University is progressing a KPI of a 100% completion rate for staff with purchasing authority to undertake the training. Performance in 2021/22 was 49%.

The University’s approach to refresher training will be considered in 2022/23.

Statement approved by the Board of Governors on 20 September 2022.

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Professor Steven West
Vice-Chancellor, President and Chief Executive Officer
20 September 2022