

## Modern Slavery Act Transparency Statement

University of Exeter

Financial Year 2024/25

### **Introduction**

At the University of Exeter (“the **University**”), we are committed to protecting and respecting human rights and do not tolerate slavery, human trafficking and other exploitation. This statement complies with Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the University has taken regarding slavery and human trafficking.

### **The University of Exeter**

The University combines world class research with high quality education at its campuses in Exeter, Devon and Penryn and Truro, Cornwall. Formed in 1955, the University has over 25,000 students from 130 countries and over 125,000 alumni in 183 countries providing our academic community of staff, students and visiting researchers with a truly global experience and diverse, inclusive environment. Its success is built on a strong partnership with its students and academics and a clear focus on high performance.

### **Policies**

As already noted, the University is committed to protecting and respecting human rights and has embodied this ethical stance in a number of its policies, including:

- The University Ethics Policy
- Professional Code of Conduct
- Dignity and Respect
- Good Practice in the Conduct of Research
- Social Value Policy
- Sustainability Policy

The University has several policies that set out standards for procurement and suppliers. These include:

- Sustainable Bought Goods and Services Policy. This policy ensures we procure goods and services that minimises damage to environmental, social and ethical issues.
- Chartered Institute of Purchasing and Supply (CIPS) Code of Conduct. Most of our strategic procurement officers are members of CIPS, the professional association. As members, they must comply with this code, which includes adherence to laws, ethics and personal integrity
- Fair Trade policy
- Sustainable Food Policy
- Procurement Policy on Modern Slavery

- [Procurement Procedures Manual](#). This includes guidance on social value, modern slavery & IR 35 legislation.
- [HEPA published Modern Slavery Act 2015 Tools](#)

## **Procurement Supply Chain**

In the Financial Year 2022/23, the University spent circa £130 million gross and currently has 8398 active suppliers on T1. Procurement valued at and above £50,000 ex VAT was managed by Strategic Procurement to ensure compliance with legislation & to achieve value for money on bought-in goods and services. Spend below this figure is mostly undertaken either by Operational Procurement or directly by the Colleges and Professional Services Teams.

Almost all supplier expenditure was with suppliers who have registered addresses in the UK, of which relatively few items relate to outsourced services.

## **Risk**

The University has undertaken a high-level risk assessment to identify the potential sectors and suppliers where issues around human trafficking has historically arisen including:

- Supply of clothing/uniforms
- Outsourced cleaning services
- Outsourced security services for events
- IT industry, including computers, tablets, and mobile phones
- Agency Workers
- Construction industry

**Clothing:** The University does not have a significant volume of purchase from the clothing sector. Most members of staff do not wear a uniform; however, we do have a contract in place for the sports centre with student clothing. The tender included clauses regarding modern slavery and living wage. Graduation gowns were purchased using the London Universities Purchasing Consortium (LUPC) framework. It was a requirement of being approved onto the framework that suppliers had to sign the 'Sustain Supply Chain Code of Conduct', which covers aspects of Modern Slavery and Sustainability. Having considered our supply chain and our procurement procedures, we have assessed the risk to be low.

**Outsourced cleaning services:** The University purchases outsourced cleaning services from local SMEs to supplement its own cleaning teams during periods of high demand e.g. summer school, events etc. Having considered our supply chain and our procurement procedures, we have assessed the risk to be medium but is managed through robust due diligence checks.

**Outsourced security services:** The University purchases outsourced security services from local SMEs to supplement its own security teams during periods of high demand to facilitate events etc. Having considered our supply chain and our procurement procedures, we have assessed the risk to be low.

**IT:** The University purchases a wide range of electronic and IT equipment and software. Some of those items, particularly laptops, mobile phones and tablets can contain metals usually sourced in high-risk regions and the University is aware there is a well-documented risk of dangerous working conditions and child labour. However, the University's main suppliers of such devices have robust Modern Day Slavery policies in place, and both actively monitor and address beaches in respect to these across their supply chains. These suppliers work in collaboration with peer groups and recognized agencies to adopt best practice.

Agency Workers: The University has identified there is a potential risk with agency staff for cleaning, portering and other high service roles. We seek to encourage suppliers to change their business model to enable businesses to pay their staff the Real Living Wage (RLW). The use of agency workers is quite limited and normally undertaken via existing university sector frameworks awarded after careful due diligence of suppliers. Where agencies are used on a one-off basis these tend to be UK-based and registered businesses. The main cleaning contract stipulates that the RLW is to be paid to staff, with regular checks undertaken.

Construction: Most construction is carried out by major companies, which perform much of their work through their sub-contractors. 90% of our building contractors abide by the Considerate Contractor code of conduct which includes a commitment to the well-being of the site workforce. The University also uses several procurement frameworks to source its contractors all of which use the Constructionline PAS91 pre-qualification process to vet contractors.

In terms of procurement, also see below the statements regarding Terms and Conditions and contractual arrangements.

### **Training**

The University arranged training on the Modern Slavery Act for staff, and additionally, Procurement Services' staff have also undertaken training that specifically addresses 'Protecting Human Rights in the Supply Chain' a course that looks at the issue of human trafficking/ethical procurement. This training is available to all strategic procurement staff and other senior personnel involved with operational procurement.

The strategic procurement team has undertaken training with CIPS for Modern Slavery and Social Value in 2023.

The University has updated its corporate governance training and this now includes a section that covers the Modern Slavery Act. This training is available to all staff.

Social Value has also been introduced into our procurement practices, the strategic procurement team have purchased and implemented the Social Value Portal which will monitor and report on the Social Value benefits being realised through third party spend.

### **Procurement and Contractual Due Diligence**

The University maintains its procurement templates, including the Selection Questionnaire and tendering documentation to ensure these are in line with regulatory requirements around modern slavery.

The University also works with a Higher Education procurement consortia including the Southern Universities Purchasing Consortium (SUPC) and is reassured that they are applying similar measures to their procurements and framework agreements.

The University maintains its standard terms and conditions for purchasing of goods, works and services, together with its contracts for Contractors and Consultants, to include an obligation to comply with the Modern Slavery Act and to pass this down to any supply chain.

### **Identifying Instances of Modern Slavery in Supply Chain**

The University has not identified any instance of a breach of the Modern Slavery Act in its

supply chain. Additionally, the University considers that a breach of the Modern Slavery Act would be a material breach of its contracts. In a scenario where the University identified any instance of modern slavery in its supply chain, it would seek to take action in accordance with due process. Actions would include: informing the police and terminating a contract.

Procurement at the University works to a category management approach, which gives a greater granularity of detail regarding categories of expenditure (particularly focusing on IT infrastructure, construction, cleaning and catering). This will enable the University to reduce its supplier base and have greater scrutiny of these suppliers and their supply chain.

### **Raising Concerns**

Where staff or others have concerns about potential breaches of the Modern Slavery Act, these can be raised directly with the University's Chief Financial Officer, who can be contacted via the following e-mail address: [d.stacey@exeter.ac.uk](mailto:d.stacey@exeter.ac.uk).

### **Monitoring and auditing**

The University does not have the resources to audit its supply chain to second, third (and lower) tiers, so we intend to collaborate with others in the Higher Education sector and Central Government (e.g. Cabinet Office/CCS frameworks). The University has reviewed and tried one service for monitoring corporate social responsibility (CSR) for suppliers, but this seemed undeveloped and unsuited for our needs.

The University analyses its external expenditure on bought goods & services to better understand & manage this expenditure. The University has purchased licenses for the following tools to help audit/monitor modern slavery requirements:

- **EcoVadis** - The EcoVadis sustainability assessment provides ratings and scorecards for suppliers and is an evaluation of how well a company has integrated the principles of Sustainability/CSR into their business and management system. The university is working towards its goal that all Tier 1 suppliers secure their sustainability rating from EcoVadis. Suppliers are required to adopt this strategy upon the award of a contract that is imperative to the activities of the University.
- **Net Positive Futures** - a supply chain sustainability monitoring platform that helps the university to better capture and understand supply chain activity plans for Modern Slavery Act and its carbon footprint from bought goods & services. It is a requirement for Tier 2 and 3 suppliers to sign up and we are working hard to onboard as many as possible.
- **Social Value Portal** - Social Value Portal enables us to procure, measure, manage and report social value via a single, easy to use, adaptable platform. This software is being implemented during 2024 and it will be a requirement for all tenders over £50,000 to include Social Value.

### **Finance and Procurement Systems**

The University's finance and procurement systems:

- improve the visibility of our chosen suppliers and contracts so members of staff can select goods and services from approved suppliers;
- provide greater clarity and auditable detail regarding how we identify and procure our suppliers and contractors;
- facilitate our management of suppliers e.g. supplier rationalisation, supplier

- relationship management;
- facilitate our management of supply categories and mitigate their risks.

## **HR Statement**

The University directly employs approximately 7000 employees and we have a robust set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce.

Our Human Resources (HR) directorate and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, applicants have to provide 'right to work' information which is checked at offer stage. The majority of interviews are conducted visually in either a face to face or live video format which provides assurance that individuals have freely chosen to attend. A copy of the interviewee's right to work documentation is taken and either the originals verified by a University employee or, for visa holders (where applicable), the Home Office online checking service is used. The Home Office check is then verified virtually by means of a video call. The 'right to work' checks take place before a potential employees start date or on the morning of their first date of employment.

All employees receive a written contract of employment. HR also provide information to all new employees on their contractual rights including sick pay, holiday pay and other benefits they may be entitled to.

The University is committed to paying the Living Wage Foundation "Real Living Wage".

Salary payments will only be paid into a bank account (or joint bank account) in the name of the employee/worker.

As the University implements its Global Strategy, we expect to employ an increasing number of individuals outside the United Kingdom. The University has agreed a policy and procedures to ensure that overseas employment is fully compliant with statutory requirements in the host country on tax, social security and employment, where appropriate taking advice from professional advisers in the host country. This will include ensuring that employment arrangements, whether they are employed directly by the University or through a third party, comply with the University's responsibilities under the Modern Slavery Act.

## **Alumni/Donors**

The University has also incorporated reference to the Modern Slavery Act into its Reputation Management Policy, to ensure that the terms and requirements of the Act are recognised in our dealings with our alumni and potential donors.

## **Future Steps**

As noted above, the University is committed to developing its policies, processes and procedures to ensure on-going compliance with the Modern Slavery Act and to ensure the policies around a zero tolerance to incidents of human trafficking and slavery are embedded.

The University intends to maintain its training programmes on the Modern Slavery Act and will have access to new systems which facilitate the on-going monitoring of supply chains to facilitate effective risk management and on-going monitoring of potential areas of high risk.

This statement is available at the University's web site [here](#).

**Version 3 Owned by the General Counsel and Director of Legal and Student Cases**

Endorsed as follows:

- University's Executive Board, at its meeting on 22 February 2024
- Audit and Risk Committee, at its meeting on 5 March 2024.

Approved as follows:

- Council, at its meeting on 18 April 2024

Professor Lisa Roberts

President, Vice-Chancellor and Chief Executive