



Slavery & Human Trafficking Statement

This modern slavery and human trafficking statement for the financial year ended 31 March 2020 is made in accordance with section 54 of the Modern Slavery Act 2015.

Introduction from the Chief Executive, Nigel Portwood



Oxford University Press seeks to prevent acts of modern slavery and human trafficking from occurring within its business and supply chain. We continuously review our policies and procedures to ensure that effective systems and controls are in place to appropriately address these risks. We have a zero tolerance approach to modern slavery and human trafficking and expect the same high standards and commitment from our business partners.

A handwritten signature in dark ink, reading 'Nigel Portwood'.

Nigel Portwood, Chief Executive, OUP

Our structure

Oxford University Press ('the Press') is a department of the University of Oxford ('the University'). We are the largest university press in the world, with offices in more than 50 countries and nearly 6,000 employees. We also have a number of subsidiaries across the world. This statement refers to the activities of the Press globally. Further information about us and our mission can be found [here](#).

Our mission-led activities

Our mission is to further the University's objective of excellence in research, scholarship and education by publishing worldwide. We publish thousands of titles each year globally, in more than 90 languages and in both digital and print formats. Our products span the academic and educational spectrum, to support all audiences – from pre-school to secondary level schoolchildren; students to academics; general readers to researchers; individuals to institutions. Our product range includes dictionaries, English language teaching materials, children's books, journals, scholarly monographs, music, higher education textbooks, and schoolbooks.

Supply chain summary

Our supply chain includes the following principal activities:

- Digital platform development and hosting.
- Production of printed materials, and ancillary items.
- Freight.
- Warehousing.
- Procurement of goods and services not directly related to the production of digital and print products.

We sell to customers globally and procure goods and services from suppliers across the world. We operate 23 warehouses across 18 countries, which are a combination of OUP-managed sites and sites managed by Third Party Logistics providers.

Along with other leading book and journal publishers, we are part of the Book Chain Project, which focuses on specific areas related to the publishing industry's supply chains. The Book Chain Project has established minimum labour standards for employees at global print suppliers and paper manufacturers. These standards expressly prohibit modern slavery and human trafficking.



Policies

Our Code of Conduct lays out the principles and standards which underpin our work and support us in making good decisions every day. It states that we oppose illegal or inhumane labour practices, expecting our suppliers and other partners to do the same, and that we will take steps to ensure that there is no slavery or human trafficking in our business or supply chain. It also states that we support universal human rights including equal employment rights, safe workplaces, freedom of speech and of association, and the rights of all to an education. A copy of our Code of Conduct can be found [here](#).

Our Partner Code of Conduct, which gives a clear view of the values and principles that underpin our work, is made available to all our business partners, and we expect them to act in accordance with it at all times. It states that we oppose illegal or inhumane labour practices, including the use of forced or child labour, and take steps to ensure that employment is freely chosen and that there is no slavery or human trafficking in our business or supply chain. A copy of our current Partner Code of Conduct can be found [here](#).

Our Raising Ethical Concerns policy encourages staff and business partners to report ethical concerns directly or through a whistleblower channel managed by a third party. It includes specific reference to ethical concerns relating to illegal and inhumane labour practices, such as slavery and human trafficking.

Our Employment Policies require that appropriate vetting checks are carried out when we recruit new employees to ensure their employment complies with relevant laws and to establish, so far as possible, that they meet our ethical standards. Our Global Human Resources function ensures that pay and conditions are appropriately managed, and monitors pay and benefits against market conditions.



Training and communications

We deliver comprehensive anti-modern slavery and human trafficking presentations to key internal stakeholders including procurement specialists, and senior managers in our Operations and Supply Chain teams. This ensures that they are equipped to support

our efforts to identify and address any issues of modern slavery. In 2019 anti-modern slavery content was added to our online ethical training module which all OUP employees and contractors are required to undertake annually.

Risk assessment and key risks

Our evaluation of key modern slavery and human trafficking risks within our supply chain has indicated that the following types of supplier activity continue to present a higher risk:

01 Production of printed materials, including paper supply.



02 Production of items ancillary to the production of printed materials including, in particular, toys and textiles accompanying certain educational resources.



03 Digital editing and typesetting.



04 Supply of electronic devices to the Press.



We select our suppliers with great care. Our risk assessment tool has been developed specifically to help identify modern slavery risks, taking into account country risk, product/service risk, and annual expenditure. This tool regularly identifies a small number of suppliers which pose a greater risk of modern slavery or human trafficking.

Due diligence and contracting

We issue a questionnaire to prospective suppliers identified by the above process to assess whether they are likely to work in a manner consistent with our Partner Code of Conduct, and what further due diligence may be required. It includes questions relating directly to modern slavery and human trafficking to help us understand:

- The processes these suppliers have in place to ensure human trafficking and slavery does not exist in their supply chains, including whether they conduct independent audits of their operations and suppliers.
- Whether they use prison labour in their operations and/or in their supply chains.
- The steps they have in place to ensure their employees are trained to understand the risks and ethical concerns around modern slavery and human trafficking.
- Any programmes they have in place to remediate non-compliance by their staff and suppliers relating to modern slavery and human trafficking.

Following receipt of their responses, we conduct extensive due diligence including searches of public databases. In 2019 and early 2020, we carried out 37 modern slavery audits of suppliers based in India, China, Malaysia, Turkey, Spain, Vietnam and the UK. These were intended to confirm that no modern slavery is present in their businesses and to understand how these suppliers are managing and mitigating modern slavery risks within their operations and supply chains. Where we identify potential modern slavery issues, we take immediate and appropriate action.

We continue to negotiate contractual clauses into our agreements with suppliers where appropriate to address the risk of slavery and human trafficking and to require compliance with our Partner Code of Conduct.

Monitoring and Review

We have developed appropriate Key Performance Indicators (KPIs), which measure:

- The number of suppliers we have assessed as posing a higher modern slavery risk.
- How many of these suppliers have been the subject of additional due diligence.
- The number of modern slavery audits conducted on such suppliers during the year.

Following the completion of due diligence and any supplier audits, we also measure the number of higher risk suppliers which we have agreed to work with, the number we have rejected as business partners, and the number of higher risk suppliers we have agreed to work with only if they implement additional anti-modern slavery measures to address our concerns.

We have also enhanced our monitoring and review programme to include checks across our organisation on how well our anti-modern slavery controls have been implemented in practice.

This statement has been approved by the Press's Finance Committee and the Press's Executive Committee.



Nigel Portwood
Chief Executive
Oxford University Press

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