



Swansea University  
Prifysgol Abertawe

# Modern Slavery Act 2015

## *Annual Modern Slavery and Human Trafficking Statement 2022/23*

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> July 2023.

Swansea University takes a zero-tolerance approach towards modern slavery.

### **Organisational Structure**

Swansea University is an ambitious, research-intensive institution with more than 20,000 students and over 4,000 staff.

The University's governing body, the Council, has general control over the University and its affairs, purposes and functions.

The Senior Leadership Team has operational responsibility for the University, consisting of the Vice-Chancellor, the Provost, the Pro-Vice-Chancellors, the Registrar and Chief Operating Officer and the Chief Financial Officer. This body provides a forum for advising the Vice-Chancellor and other senior officers of the University on matters relating to their portfolio responsibilities.

The University's financial statements can be found at <http://www.swansea.ac.uk/finance/financialstatistics/>

### **Collaboration**

The University collaborates with other Higher Education purchasing consortia and other organizations' on risk assessment and due diligence processes to share good practice and avoid duplication of effort for both the Universities and external suppliers. The University also works with the Higher Education Procurement Association (HEPA) and institutions across the sector, being a member of HEPA's Responsible Procurement Group.

### **Supply Chains**

Swansea University has a global supply chain, comprising of a range of suppliers delivering goods, services and works to the University. Swansea University spends over £100million annually, purchasing a range of goods and services. Over 80% of the University's suppliers are based in the UK, however there is an understanding and appreciation that the wider supply chain may be spread globally and so the risk of Modern Slavery increases. The University will continue to focus on monitoring high risk category areas and suppliers to ensure the strategic supply chains are free from Modern Slavery. The high-risk sectors for Modern Slavery include office supplies, laboratory consumables, ICT equipment and some estates (facilities management) services. As the majority of Swansea University spend and

contractual arrangements for these sectors are through national frameworks or local suppliers the risk of Modern Slavery violations in these areas is low.

### **Ethical Employment in the Supply Chain**

The University has become a signatory to the Welsh Government Code of Practice on Ethical Employment in Supply Chains, which supports the eradication of unlawful and unethical employment practices to ensure workers at every stage of the supply chain are treated fairly.

<https://www.youtube.com/watch?v=Dh7xovOblvU&feature=youtu.be>

### **Our policies on slavery and human trafficking**

During the year to July 2022 the University acted responsibly to ensure compliance with the Modern Slavery Act 2015. Swansea University is committed to working towards ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure all parts of our business and supply chain are slavery free, we will continue to review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. The publication of this statement is also a requirement of the Welsh Government Ethical Employment in Supply Chains Code of Practice, which the University committed to becoming a signatory to alongside all Universities in Wales in July 2017. Swansea University is working towards achievement of the commitments of the Code of Practice, which includes encouraging our suppliers to adopt the Code.

### **Due diligence processes for slavery and human trafficking**

Swansea University undertakes to consider due diligence processes in our own business and that of our supply chain. We are putting systems in place to identify, assess and monitor potential risk areas in our supply chains in order that we continue to mitigate those risks. Swansea University is a member of the Higher Education Purchasing Consortium Wales (HEPCW). HEPCW works effectively alongside its counterpart UK Universities Purchasing Consortia. The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high-risk categories such as office supplies, laboratory consumables, ICT equipment and some estates (facilities management) services.

Swansea University is working collaboratively with HEPCW and within the HE Purchasing Consortia to identify the suppliers in these high-risk categories, in relation to slavery and human trafficking, and has signed up to the Welsh Government's Transparency in Supply Chains (TISC) Register.

The Universities tendering process ensures all suppliers understand their obligations as a University supplier and provide a commitment to tackle Modern Slavery within their supply chains. Swansea University also carries out due diligence checks on all new supplier's compliance with the Modern Slavery Act, ensuring that all relevant commercial organisations (as defined in section 54 of the Modern Slavery Act 2015) are compliant with the reporting requirements.

## **NETPositive Futures**

Working with the wider Welsh Higher Education Purchasing Consortium, the University has engaged NETPositive Futures to deliver an interactive database of current suppliers to assess their conformance with the Modern Slavery Act 2015. The system will:

- Provide a single mechanism to engage contracted and non-contracted suppliers with the issues of Modern Slavery
- Collect data on which of our suppliers are aware of and engaged with aspects of modern slavery
- Provide a mechanism to offer support, guidance or training to our supply base and to share best practice between them
- Enable us to track the actions being taken and progress being made by our supply chain in addressing aspects of modern slavery
- Provide us access to this information in real time
- Allow us to build modern slavery into our contract management processes based on the action plans developed by our suppliers

## **Mitigating risk by supplier adherence to our values**

Many of our suppliers in these higher-risk categories have committed to the Base Code of the Ethical Trading Initiative (ETI) and the UK Universities Purchasing Consortia are working to persuade the remaining suppliers in these categories to join them. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

Swansea University was the first in Wales to achieve Fairtrade status. The University's Campus Catering service has a strong commitment to sustainability, Fairtrade, and to local purchasing. Fairtrade is about better prices, decent working conditions, local sustainability and fair terms of trade for farmers and workers in the developing world.

In addition, Swansea University was the first Welsh organisation to affiliate to Electronics Watch. Electronics Watch is an independent monitoring organisation that helps public sector buyers work together to ensure respect for labour rights and safety standards in factories that make the ICT hardware they buy. By operating on an affiliations basis, Electronics Watch allows public buyers to share the cost of monitoring suppliers with the whole network of affiliates and coordinate industry engagement. Swansea University is working in affiliation with Electronics Watch to therefore develop transparency through its supply chain to lower tier suppliers, to mitigate the risk of unethical employment practices, for example conflict minerals supplied to electronics manufacturers.

## **Real Living Wage**

The real living wage is independently calculated based on what employees and their families need to live and is higher than the national living wage set by the UK Government. Updated annually, accredited employers pay the real living wage rate on a voluntary basis. Swansea University voluntarily implemented the real living wage for all its salaried employees in April 2019, benefitting more than 1,000 of its lowest paid employees. Since then, it has gained its real living wage accreditation from the Living Wage Foundation (LWF) by paying the real living wage to all directly employed staff and also those who have been subcontracted.

Swansea's accreditation from the LWF, which came into effect on 1 June 2020, will allow the University to promote and encourage policies and practices which are an important part of helping its 4,000 staff to lead fulfilling and rewarding working lives. The University is also currently developing a plan to roll out the real living wage across third party contracts as they come up for renewal.

Accredited real living wage employers report that becoming accredited has helped relations between staff and their managers, has led to an increase in motivation and retention rates, and has helped boost the reputation of their organisation.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in Swansea University supply chains and the organisation as a whole, we will continue to raise awareness of modern slavery.

The Procurement and Sustainability teams work closely to develop internal awareness training, utilising relevant resources, and to strengthen internal policies and procedures in line with ISO standards. This awareness raising is aimed at relevant levels and roles within the University. By identifying staff involved in the buying process, training is provided to aid awareness, and to help in identifying risks in the supply chain that they are part of.

## **Our effectiveness in combating slavery and human trafficking**

Swansea University has begun to integrate the Modern Slavery Act 2015 into our ISO14001 (2015) Environmental Management System and Legal Register, which will:

- support identification and mitigation of associated impacts and the development of University-wide key performance indicators for performance management
- provide externally audited assurance
- provide a mechanism to increase awareness throughout the University community
- consider appropriate legal clauses in contracts to manage and monitor suppliers more effectively.

## **Whistleblowing (Public Interest Disclosure) Policy**

The University has in place a Whistle-Blowing (Public Interest Disclosure) policy and procedures to enable staff, students and other members of the University to raise concerns which are in the public interest relating to allegations of fraud, malpractice, impropriety, unethical behaviour or improper conduct. The policy and procedures ensure that concerns made in good faith are dealt with robustly and fairly, and that members raising such concerns are not subject to any form of victimisation. The policy was revised in November 2021 and now includes within its scope the provision for University staff to report concerns of Modern Slavery Act violations within the University's supply chain. The University's Whistleblowing policy can be found here:

[Whistle-blowing - Swansea University](#)

## **Our Governance & Policies**

### **•[Sustainable & Ethical Procurement Policy](#)**

This policy is integral to our procurement activities and was developed in collaboration between the Procurement and Sustainability teams.

### **Duty to Notify**

From 1 November 2015, specified public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking. Whilst the University is not listed as a relevant public authority in this respect other organisations, including NGOs, are also encouraged to put forward notifications where they encounter a potential victim of modern slavery who does not want to enter the national referral mechanism (NRM). If an individual is perceived to be at an immediate risk of significant harm call '999'

There are factsheets and a poster that explain what you need to do if you think someone has been a victim of Modern Slavery:

[Modern Slavery - Duty to Notify Poster:](#)

[Modern Slavery - Duty to Notify Factsheet:](#)

### **Further steps for 2022/23**

The University is currently reviewing its Procurement governance documents, part of this work will develop on the sustainable ethical procurement practices of the University, including the requirements of the Modern Slavery Act. This review will specifically include:

- An assessment of the University's governance structure
- Strategic suppliers sustainable risk assessments
- Training review

Swansea University is committed to further developing understanding and effectiveness in this area, with an aim of achieving greater transparency within our supply chains and acting responsibility towards people working within them. Swansea University will continue to assess key risk areas within our spend portfolio and develop strategies to mitigate any potential risk.

***Bleddyn Phillips***

***Pro-Chancellor and Chair of Council***