



Modern Slavery Act 2015

Annual Modern Slavery and Human Trafficking Statement 2019/20

Introduction from the Registrar and Chief Operating Officer

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 31st July 2020.

Organisational Structure

Swansea University is an ambitious, research-intensive institution with more than 20,000 students and just over 3,000 staff.

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

The Senior Management Team has operational responsibility for the University. University Management Board is the senior management and operational committee of the University, consisting of the Vice-Chancellor, the Pro-Vice-Chancellors, the Heads of Colleges, the Registrar, the Director of Finance and two representatives of the Directors of key administrative operations. This body provides a forum for building common purpose across the Institution and 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 [financial statistics](#).

Supply Chains

Swansea University has a global supply chain, comprising of a range of suppliers delivering goods, services and works to the University.

Our policies on slavery and human trafficking

During the year to July 2019 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 that all parts of our business and supply chain are slavery free, we will 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



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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 similarly 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 will put systems in place to identify, assess and monitor potential risk areas in our supply chains in order 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.

Tenders conducted by Swansea University require bidders to confirm compliance with the Modern Slavery Act 2015 as part of a mandatory requirement of the selection process, and all new suppliers to the University are also required to confirm their compliance with the Legislation.

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:

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

In addition, Swansea University was the first in Wales to achieve Fairtrade status. The University's Campus Catering division 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.



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Swansea University is officially affiliated to the Worker Rights Consortium (WRC). The WRC is an independent, non-political labour rights monitoring organisation, which collaborates with workers, non-governmental organisations, and other universities and colleges, to improve the conditions of workers in the garment industry.

By affiliating with the WRC, the University agrees to adopt a code of conduct to consider issues such as wages, hours of work, overtime compensation, freedom of association, workplace safety and health, women's rights, child and forced labour, harassment and abuse in the workplace and non-discrimination.

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.

[Electronics Watch 2019/20 report](#)

Finally, in 2019/20 Swansea University participated actively in the Equiano tool pilot. Equiano is a supply chain human rights abuses assessment tool; Swansea University is currently reviewing our outcomes of the assessment in conjunction with the relevant suppliers.

More information regarding the Equiano and the pilot below:





Equiano was developed with funding from the Local Government Association and under the supervision of the BHRE at the University of Greenwich. This supplier engagement tool was designed by us to gather information to help identify risks of human rights abuses in public supply chains. It offers a low cost alternative to private systems used by high street retailers when conducting human rights due diligence in supply chains.

In total, 7 institutions and local authorities participated in the pilot, including the LUPC. Participants were asked to put forward a varied list of their suppliers from higher-risk spend categories. Amongst all the participants' suppliers we selected and invited 153 to take part in the pilot. Suppliers were asked to complete a questionnaire consisting of 35 questions which were designed to allow us to gain insight into the supplier's operations and activities, covering procurement, sustainability, modern slavery and human rights due diligence. Following the analysis of the answers given by suppliers, a multi-stage risk assessment was carried out. The risk assessment was done by trained staff and the project as a whole was overseen by an expert from the [BHRE](#).

The Equiano pilot project ran between April and August 2018, and in September we provided each participant with a report outlining our findings with each individual supplier of theirs as well as recommended follow up actions aimed at achieving greater transparency in the supply chain. Considering that participation in the pilot was voluntary we are very pleased the submission rate was 51%.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we intend to raise awareness of modern slavery. This awareness raising will be aimed at relevant levels and roles within the University. By identifying staff involved in the buying process, training will be provided to aid awareness, and to help in identifying risks in the supply chain that they are part of, utilising relevant resources available, for example Welsh Government Code, training literature etc.

Procurement staff will complete the Chartered Institute of purchasing and Supply (CIPS) 'Ethical Procurement and Supply' on-line training, or equivalent.

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, this will:

- support the development of University-wide key performance indicators;
- provide externally-audited assurance; and



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- a mechanism to increase awareness throughout the University community.
- Consider appropriate legal clauses in contracts to manage and monitor suppliers more effectively.

Our Governance & Policies

- [Sustainable & Ethical Procurement Policy](#)

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

Further steps for 2019/20

During the new Financial Year the University will explore the opportunity to review our Staff Whistleblowing Policy and consider ways to widen the scope to include supply chain in relation to the Modern Slavery Act.

The University is currently reviewing its Procurement Strategy and will implement sustainable ethical procurement practices which will include the requirements of the Modern Slavery Act. This will specifically include:

- Governance structure
- Risk assessments associated to categories
- Supplier assessment

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 responsibly towards people working within them.

Swansea University Procurement and Sustainability teams continue to work closely to develop internal awareness training and strengthen internal policies and procedures in line with ISO standards.

Swansea University will continue to assess key risk areas within our spend portfolio and develop strategies to mitigate any potential risk.

Sir Roderick Evans
Chair of Council

