



University Of Plymouth Modern Slavery and Human Trafficking Annual Statement 2021/22

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st July 2022.

INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, such as slavery, servitude, forced and compulsory labour, child exploitation 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 is now our fifth successive annual statement and the University of Plymouth remains committed to improving our practices to combat slavery and human trafficking.

OUR STRUCTURE

The University of Plymouth is renowned for high quality, internationally leading education, research and innovation. We make a positive difference to people's lives. With a truly global outlook, we are an inclusive and inspiring university community.

The [University's Structure](#) is that of an Independent Higher Education Corporation and an exempt charity under the terms of the Charities Act 2011, with the Office for Students (OfS) acting as the Principal Regulator. Our charitable objectives focus on the delivery of education and research. As a charity, the University must operate for public benefit.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

In pursuit of [Our Mission](#) the University of Plymouth procures a truly diverse range of goods, services and works. As we undertake our voyage, we are committed to taking action in order to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our operations.

OUR SUPPLY CHAINS

The University of Plymouth's supply chains are truly diverse, with over 2,000 suppliers supporting our delivery of high quality teaching and research.

When a supplier is on-boarded to the University Finance system, they are assigned a commodity code from the Proc-HE schema/taxonomy. By doing this, the University is better positioned to identify suppliers who trade in commodities where potential for Modern Slavery and Human

Trafficking is a higher risk. The use of Proc-HE coding in this way draws upon the collaborative work and outputs of the Higher Education Procurement Association's (HEPA) Responsible Procurement Group. The highest risk commodities areas have been identified as follows:

- Audio-Visual, IT & Multimedia Supplies;
- Catering Supplies & Services;
- Furniture, Furnishings & textiles;
- Janitorial & Domestic Supplies & Services;
- Professional & Bought-in Services including consultancy;
- Travel & Transport (incl. Vehicle hire & Subsistence);
- Estates & Buildings;

WHAT WE ARE DOING NOW

The University has a [Tendering Policy](#) that details the processes for spending University funds with the supply chain. This Policy includes a Responsible Procurement statement, which includes Social, Ethical, Economic and Environmental factors. Both the Policy and Statement are reviewed and updated periodically.

Following the publication of our Procurement Strategy 2020-23, we reaffirmed our commitment to addressing Modern Slavery. In order to advance this, the whole Procurement team have completed e-learning through Higher Education Procurement Association (HEPA) on 'A Guide to Modern Slavery' and 'Protecting Human Rights in the Supply Chain' and in addition. By virtue of the topics of Modern Slavery being a key priority, this also ensures it features regularly as a discussion topics at Procurement team meetings.

In recognising that the University buys commodities that have been identified as high-risk for modern slavery and human rights infringements (for example Audio-Visual, IT & Multimedia Supplies), the University has become an affiliate to [Electronics Watch](#) in 2021. Electronics Watch is an independent monitoring organisation that helps public sector buyers work together to ensure respect for labour rights and safety standards, particularly in factories that make the ICT hardware.

We are also committed to a [sustainable food culture for staff and students](#), meaning one that supports local, sustainable and Fairtrade suppliers and produce. This is something that has been recognised by both the Times Higher Education Impact Rankings for Zero Hunger, where the University was ranked 19th out of 442 institutions in 2021; and also by the Sustainable Restaurant Association in re-awarding their top rating of 3 Stars. By promoting this culture through our tender processes when establishing contracts for catering supplies & services, we consider modern slavery and human rights infringement risks and seek to address them early on in the contracting process.

The University of Plymouth engages with its purchasing consortium SUPC (Southern University Purchasing Consortium) to support ethical sourcing by incorporating checks against slavery and human trafficking as part of the collaborative procurement activity.

The University's [terms and conditions](#) for direct tendering or contracting, including the supplier on-boarding process, aim to ensure the potential for Modern Slavery and Human Trafficking are duly considered at the early stages of the contracting cycle.

Awareness to our staff about Modern Slavery and Human Trafficking is supported through promotion of the [UK Modern Slavery & Exploitation Helpline \(Unseen\)](#) via our internal Procurement SharePoint pages.

We will continue to identify those supply chains that represent a risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations, by working with both suppliers and members of both regional and sector purchasing consortia, taking appropriate action if we become aware of such activity.

It is University policy that all new staff joining the University provide documentation to demonstrate their Right to Work within the UK before commencing employment. For those in higher risk areas, this is asked for at the interview stage.

Over recent years that have seen wide scale demand for Personal Protective Equipment (PPE) in response to the COVID 19 global pandemic, we have continued close working with suppliers of these products remaining conscious of the potential for labour rights violations, an approach, which has seen sharing of knowledge and scrutiny of supplier audits with their supply chain.

WHAT WE ARE GOING TO DO IN THE FUTURE

University of Plymouth expresses its commitment to the continuous review of the supply chains it uses, working towards greater transparency and awareness of the people working within them.

The challenge of modern slavery and human trafficking is one that is best addressed through the ongoing and proactive engagement with suppliers, the Higher Education Procurement Consortia and wider professional networks such as HEPA (Higher Education Procurement Association), through which the sharing of experience will establish and maintain best practice.

During the Financial year ending 31st July 2022 we will;

- Continue dialogue with suppliers to the University, to explore collaborative supply chain mapping, whereby both the costs and outputs/benefits can be shared.
- Undertake a midpoint review and update to our Procurement Strategy 2020-23. This is an opportunity to reflect upon progress in all areas, including the commitment to addressing the modern slavery agenda, which is already established as a key priority within the Strategy;
- Work with our Sustainability team, to explore the suitability and associated benefits of integrating responsibilities under the Modern Slavery Act 2015 (the 'Act') into our ISO14001 (2015) Environmental Management System accreditation. The perceived benefits include:
 - Providing externally-audited assurance;

- An additional means of raising awareness of University responsibilities under the Act;
- Support in the development of University-wide key performance indicators;
- The University already makes the [Speak Up](#) platform available to staff, students and suppliers. It is available to support the anonymous reporting of any abuse, harm or hate and any such allegations are taken incredibly seriously. We will review the suitability of using this platform as a mechanism to report any modern slavery or human trafficking concerns, alongside the existing [UK modern slavery & exploitation helpline \(Unseen\)](#)



Louise Parr-Morley
Interim Chief Financial Officer

26th January 2022



UNIVERSITY OF
PLYMOUTH