

Modern Slavery and Human Trafficking Statement

Introduction

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 31/07/2021

Modern slavery is a crime. Within an organisation's supply chain, this can take various forms such as forced labour, debt bondage (or bonded labour), child slavery 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.

We are committed to continually improving our practices to combat modern slavery and human trafficking in all its forms across our organisation's supply chain.

Organisational structure

The University of South Wales is a large multidisciplinary University based in South Wales with campuses Pontypridd, Cardiff, and Newport. The Royal Welsh College of Music & Drama and the College Merthyr Tydfil are wholly owned subsidiaries of the University but separate legal entities with their own Boards of Directors,

The University is led by its Vice Chancellor, Doctor Ben Calvert, supported by a small Executive team and advised by his Academic Board. The University is a Higher Education Corporation and is governed by a Board of Governors with a majority of independent governors. Academically the University is organised into three faculties, each with a number of schools. The University has around 30,000 students and is one of the largest, by student numbers in the UK.

Our supply chains

The University procures its need for goods, services and works in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society, the environment and the economy. The University's supply chains mainly fall under five 'super-categories', which are:

- Laboratory Consumables and Equipment
- Library Resources
- Professional Services (including international recruitment agencies)
- ICT Equipment and Services
- Estates Goods (including food and catering supplies), Services and Works

The principal categories within our supply chain which carry material risk of modern slavery and human trafficking are office supplies, laboratory consumables, food and catering supplies, apparel, ICT equipment, international recruitment agencies and some estates services, such

as cleaning services outsourced from time to time. These categories have been identified based on the country from which the goods are made and sourced, or where the procured service includes provision of a workforce to deliver the required service.

The University of South Wales is a member of the Higher Education Purchasing Consortium Wales (HEPCW). HEPCW works effectively alongside its counterpart UK Universities Purchasing Consortia and national groups, with which it enjoys progressive and successful relationships. The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high- risk categories listed above.

Suppliers within these higher-risk categories who are part of these collaborative frameworks are required to commit to the Base Code of the Ethical Trading Initiative (ETI). For those who haven't yet joined the ETI, the Universities Purchasing Consortia continues to work to persuade them to join. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, which requires 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 practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

ICT Equipment

The University of South Wales continues to participate in a number of ICT equipment collaborative purchasing agreements. Through these collaborative purchasing agreements, the University supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe. Through this, we work with our contracted suppliers to implement and commit to new monitoring regimes where corporate codes of conduct and social auditing policies and practices are failing in their transparency and effectiveness.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that we have an organisational aligned approach to combat modern slavery in all forms within our supply chain or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our organisation 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.

Emerging government policy on ethical supply chains will also be considered by the University.

Our workplace policies and procedures will continue to demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

We will complete an annual review of our workplace policies and procedures. Any gaps identified or new requirements of government policy will be incorporated, and the policies and procedures will be refreshed and re published as required.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we will continue to have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

What we have done with regard to developing our policies and practices:

- We have continued to work collaboratively as Welsh Universities on implementing the 12 commitments of the Welsh Government's Code of Practice to ensure that workers in public sector supply chains are employed ethically and in compliance with both the letter and spirit of UK, EU and international laws.
- We have begun to develop a working relationship with the Welsh Government team responsible for creating new policies for Welsh public sector bodies. This will allow us to have improved insight and guidance in our review of our policies and procedures, and make any required changes in a timely manner.
- Working in conjunction with the newly created USW Legal team, a collaborative review of our Procurement documents has begun to reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls, including, in relation to, combating modern slavery and human trafficking in our supply chains.
- Net Positives (a supplier engagement tool used by other UK universities) has been introduced as part of our supplier relationship management programme. Using the existing data Net Positives, our baseline has now been created, allowing the measurement of year-on-year continuous improvement.
- We have launched Net Positives to our colleagues, and to the supply chain, in clusters, initially focussing on those who require a Modern Slavery Statement.
- Our baseline position is:
 - There are 166 suppliers who work with USW registered on the tool.
 - Of these 166, **54 require a modern slavery statement** and have evidenced this on the tool.
 - Of these 54 suppliers, **22 suppliers state their organisation as being at high risk of modern slavery** within their supply chain.
 - Of the 166 suppliers registered on Net Positives, **89 have made a public commitment to tackling modern slavery** within their supply chain.
 - Of the 1200 suppliers who USW worked with in FY20/21, **a further 183 require a modern slavery statement**; they are not registered on Net Positives.

What we will do with regard to developing our policies and practices:

- Implement a Contracts Repository (deferred from end of July 2021 due to other business priorities) – we have selected and will be implementing a contracts repository software solution, by end July 2022. The solution will enable us to identify areas of the supply chain where the risk of modern slavery and human trafficking is possible. It will

allow the Procurement and Legal teams to signpost where internal training and guidance on the Modern Slavery Act is required and the subsequent responsibilities of managing and mitigating the risks.

- Re - launch our revised standardised tender document to stakeholders, which includes questions regarding bidders' policies and procedures to identify and eradicate forced labour in their own operations with subsequent review and action plans. The re launch will stimulate stakeholders' consideration of this risk within the supply chain.
- Continue to launch Net Positives to our supply chain, prioritising the 183 suppliers who require a Modern Slavery Statement but aren't currently on Net Positives.
- Introduce as a minimum an annual review of the supplier action plans recorded on Net Positives, and promote the webinars offered to suppliers by Net Positives on completing the Modern Slavery action plan.
- Introduce as a minimum an annual review of the supplier action plans recorded on Net Positives for the 22 suppliers who have identified their organisation as being at high risk of modern slavery within their supply chain.
- Create a plan to understand the risks associated with the supply chain not yet on Net Positives.
- Consider appropriate, effective and proportionate ways of raising staff awareness; we will sign post the Modern Slavery Act and our commitments in our induction programme, both for new Procurement team members and for all new members of staff.
- Consider appropriate, effective and proportionate ways of raising supplier awareness both pre and post contract award. We will include a piece on Modern Slavery and our mutual commitments as part of USW's supplier relationship management programme.

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 continue to raise awareness of modern slavery and human rights abuses amongst our staff and deliver appropriate training. Procurement staff will complete the Chartered Institute of Procurement and Supply (CIPS) 'Ethical Procurement and Supply' on-line training, or equivalent.

We will investigate the HEPA training programme for non- procurement staff and consider timescales for rolling out stakeholders if appropriate and as required.

We will investigate what training solutions exist on Modern Slavery as a topic, for our supply partners and other third parties, be it a collaborative activity across other Welsh Universities or by USW alone.

Further steps

The University is committed to better understand its supply chains and work towards greater transparency and responsibility towards people working within them.

For contracts that we have awarded and participate in, we will identify those supply chains which represent a medium-to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations.

Working with our suppliers, collaborative purchasing groups and other relevant organisations, we will continue to more closely monitor those supply chains that have been identified as a potential risk and take appropriate action if necessary.

Modern Slavery and Human Trafficking Statement approved and agreed at the USW Board of Governors Meeting on November 29th 2021.

A handwritten signature in black ink, appearing to be 'LE', written over a horizontal line.

SIGNED:

Date: 1 December 2021

LOUISE EVANS
CHAIR OF BOARD OF GOVERNORS
UNIVERSITY OF SOUTH WALES