Modern Slavery Act 2015

Modern Slavery and Human Trafficking Statement

Introduction

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.

At Ulster University we are committed to our values and apply these in our approach to combating Modern Slavery and Human Trafficking. We are committed to improving our practices to ensure that modern slavery and human trafficking does not occur in any part of our organisation or supply chain.

Organisational structure

As Northern Ireland’s civic university, Ulster University is grounded in the heart of the community and strives to make a lasting contribution to society as a whole. Renowned for world-class teaching, Ulster aims to transform lives, stretch minds and develop the skills required by a growing economy. The outcomes of our research have global significance with local relevance, and contribute to the social, economic and cultural betterment of our region.

With an annual turnover of £200m, and some 24,000 students, Ulster University is one of the region’s largest employers with 2,100 staff.

The University is registered with the Charities Commission for Northern Ireland, and has a clear responsibly, as a charity, to act for the public benefit across all of its actives.

What we are doing now

Supply Chains

The University has a supplier database of over 5,000 suppliers and our procurements can either be through a regional Higher Education purchasing consortium or through direct contracting. All procurement activities are managed through a centrally controlled Procurement department, which sits within the Finance Directorate.
The University purchases a wide range of products and services, which adds to the complexities of our supply chain. We are working with our suppliers using an online tool provided by NetPositive Futures that asks and actively assists all our suppliers to develop an action plan to address Modern Slavery and other key sustainability issues within their businesses and supply chains. In this way, the University is taking pro-active steps to ensure its contracting arrangements comply with all the relevant legislation in both of these areas. Training has also been provided to procurement staff to ensure that they are aware of modern slavery and human trafficking issues in this area. Modern slavery and human trafficking form part of the University Sustainable Procurement Strategy.

A more detailed overview of our progress since we published our first statement can be found in our Modern Slavery Update (Appendix 1).

Future Priorities

Procurement

Building on the baseline we have established we intend to continue to ensure Modern Slavery is considered as a fundamental part of the procurement process, and that we continue to both challenge and support our supply base. More specifically we will

1. Increase use of the supplier engagement tool within high risk modern slavery sectors
2. Increase the number of practical actions taken by our suppliers when responding to modern slavery
3. Continue to develop modern slavery awareness amongst the procurement professionals within the university

We will continue to build awareness and knowledge across all areas of the University through information and training initiatives and review all university wide policies to ensure compliance with the Act. We will examine modern slavery and human trafficking awareness in our student population and explore self-evaluation and assessment techniques to help identify risks. We will look at how we can integrate best practice to improve performance.

Employment of staff

We ensure that staff employed directly are recruited by following a robust set of employment policies and procedures. We also have a dignity at work and a safeguarding policy to ensure protection of staff, and a whistleblowing policy for staff who wish to report wrongdoing in these areas.

For staff recruited on a temporary basis we only partner with reputable agencies who comply with our supplier policies.
People

Our People and Culture policies are reviewed regularly to ensure that they meet all legislative requirements. Creating awareness of modern slavery and human trafficking issues will form part of staff induction and training sessions.

Fundraising and investment

We are committed to ethical investment standards and these are reflected in our ethical investment policy. A review of our fundraising policies will allow us to integrate modern slavery and human trafficking awareness and procedures into this area of our business.

International Partnerships

Strategic international partnering delivers multiple benefits for Ulster. It serves enhance our global position and profile, extend opportunities for staff and students, unlock new initiatives in international teaching, research and delivery and support the University’s wider civic contribution and mission.

The University, through its Global Engagement strategy has committed to a rigorous approach, identifying high value partnerships and securing opportunities to work with likeminded institutions, in support of shared objectives, values and challenges.

This is underpinned by a robust evaluation through legal, business and reputational due diligence and approval as laid out in our Global Partnerships Protocol. This protocol and our Global Engagement Policy demonstrate our commitment to acting ethically and with integrity in developing our growing network of partnerships

In summary...

Our workplace policies and procedures 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 slavery and human trafficking is not taking place anywhere in our supply chains, or across our services.

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 July 2018.
Date statement approved | 29/07/2019
Final approval by | Chair of Council
Consultations held | Council, Departmental staff, University Secretary
Date for review of statement | 01/05/2020

Ms Jenny Pyper
Chair of Council

For and on behalf of Ulster University

Further information and contact

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Modern Slavery Update
The purpose of this document is to provide an update on how Ulster University has responded to the challenge of Modern Slavery both in line with the Modern Slavery Act (2015) and our civic commitments.

Since we published our Modern Slavery commitment we have taken the following actions:

### Procurement Process
- Ensured that Modern Slavery is considered at the start of every procurement project
- Ensured Modern Slavery is highlighted in the Invitation to Tender
- Incorporated Modern Slavery into a Sustainability Impact Analysis process, which is embedded within the procurement process

### Staff Development
- All procurement staff have received training on Modern Slavery
- Modern Slavery is included within the induction process for all new staff
- Detailed guidance on considering Modern Slavery has been placed on our procurement pages for staff, students and suppliers

### Supplier Development
- All suppliers have received a free sustainability action planning tool, which includes Modern Slavery
- All suppliers are asked to commit to actions on Modern Slavery and the take-up on these actions is monitored
- We review the evidence provided by suppliers on their Modern Slavery actions and commitments

In 2018 we launched a supplier development tool to support our suppliers on a range of sustainability issues including Modern Slavery. The following data has been drawn from the tool and will be used to support and shape supplier development on Modern Slavery.

#### Of the 548 suppliers registered to the tool:

<table>
<thead>
<tr>
<th>%</th>
<th>Suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>98%</td>
<td>Aware of Modern Slavery</td>
</tr>
<tr>
<td>94</td>
<td>Suppliers have made a public commitment to taking action against Modern Slavery</td>
</tr>
<tr>
<td>8%</td>
<td>Considered Modern Slavery an issue they needed to explore</td>
</tr>
</tbody>
</table>

Of our suppliers who have committed to action on Modern Slavery:

<table>
<thead>
<tr>
<th>Action</th>
<th>Not started</th>
<th>In Progress</th>
<th>Completed</th>
<th>Provided evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Publish a Modern Slavery Statement</td>
<td>13%</td>
<td>34%</td>
<td>53%</td>
<td>34%</td>
</tr>
<tr>
<td>Provide Modern Slavery training for staff</td>
<td>22%</td>
<td>25%</td>
<td>53%</td>
<td>30%</td>
</tr>
<tr>
<td>Develop a robust approach to removing Modern Slavery from your supply chains</td>
<td>19%</td>
<td>35%</td>
<td>46%</td>
<td>35%</td>
</tr>
<tr>
<td>Plan a response to the discovery of Modern Slavery in your business operations</td>
<td>29%</td>
<td>14%</td>
<td>57%</td>
<td>19%</td>
</tr>
<tr>
<td>Engage with your suppliers about Modern Slavery</td>
<td>24%</td>
<td>27%</td>
<td>49%</td>
<td>32%</td>
</tr>
</tbody>
</table>

#### Engagement by some High-Risk Sectors
Across our engaged suppliers 8% currently see Modern Slavery as an issue they need to explore. When we look at recognised high-risk sectors on Modern Slavery we see the following level of recognition for the importance of responding to this issue.

- **Furniture, Furnishings and Textiles**: 21%
- **Computer Supplies and Services**: 12%
- **Estates and Construction**: 13%
- **Stationary and Office Supplies**: 17%
- **Catering Supplies and Services**: 6%

#### Our Targets for Supplier Engagement on Modern Slavery
- Increase use of the Supplier Engagement Tool within high risk Modern Slavery sectors
- Increase the number of practical actions taken by our suppliers when responding to Modern Slavery
- Continue to develop Modern Slavery awareness amongst our procurement professionals within the University

#### Quotes from suppliers:

- **We have a policy backed by in-house training for all 5000 employees on modern slavery.**
- **We have an extensive ethical guide to which vendors are asked to agree and sign. The guide contains our Policy and requirements for alignment to the ETI Base Code.**
- **We will continue to increase awareness and support suppliers to actively respond to the challenge of Modern Slavery.**
- **Any supplier discovered to be engaged in any Modern Slavery or unethical trading practices will be immediately suspended from supplying our organisation.**