

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 responsibility, as a charity, to act for the public benefit across all of its activities.

What we are doing now

Supply Chains

The University has a supplier database of over 6,000 suppliers and our procurements can either be through various consortiums framework agreement or through direct contracting. All procurement activities over £30k 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 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 and contract managers 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 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 to 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 like minded 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 2021.

Date statement approved	December 2021
Final Approval by:	Chair of Council
Consultations held	Council, Department Staff, University Secretary
Date of review of statement	August 2022



Jenny Pyper
Chair of Council

For and on behalf of Ulster University

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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.

About our Supply Chain

Of the 744 suppliers who have created a sustainability action plan

82%	40%	27%	26%
are SMEs	have a named person for Sustainability	of suppliers source over 25% of goods or materials outside Europe	manufacture outside the UK

Made a public commitment to tackling Modern Slavery

60%	SMEs	94%	Large and Enterprise	14%	of businesses selected the Modern Slavery Issue
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Of our suppliers who have committed to action on Modern Slavery

Action	Not started	In Progress	Completed	Provided evidence
Develop a robust approach to removing modern slavery from your supply chains	47%	16%	20%	22%
Publish a modern slavery statement	52%	7%	23%	21%
Engage with your suppliers about modern slavery	48%	13%	17%	19%
Provide modern slavery training for staff	50%	11%	13%	15%

Supplier awareness of Modern Slavery

97%	SMEs	100%	Large and Enterprise
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Modern Slavery actions (based on most completed)

- 1** Publish a Modern Slavery statement
- 2** Develop a robust approach to removing Modern Slavery from your supply chains
- 3** Engage with your suppliers about Modern Slavery
- 4** Provide Modern Slavery training for staff
- 5** Plan a response to the discovery of Modern Slavery in your business operations
- 6** Develop opportunities to support the victims of Modern Slavery

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 the 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.

The policy has been communicated to all staff; with additional training for those involved in procurement.

Any supplier discovered to be engaged in any Modern Slavery or unethical trading practices will be immediately suspended from supplying our organisation.

Examples of Evidence

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We are committed to preserving human rights within our sphere of influence and welcome the Guiding Principles for Business and Human Rights adopted by the UN Human Rights Council.

We are committed to ensuring that there are no issues with regards to labour and ethics, occupational health and safety and environmental issues within our supply chain or in any part or at any level of our business.

We expect our employees, partners, sub-contractors and agents to act ethically and to promote good working practices at all levels and accept without reservation the terms and the spirit of the Modern Slavery Act 2015 and to follow through with the expectations of our policy to the letter

We work closely with the Corporate Responsibility team based in the US to define clear-cut processes that apply to all of our global branches to eliminate and prevent modern day slavery from occurring in our supply chains.

We have a number of codes of conduct and policies in place to support our approach to eliminate modern day slavery, such as: Our Code of Conduct, Supplier Code of Conduct, Channel Partner Code of Conduct and our Corporate Social Responsibility Report - all of which condemn modern slavery and exploitative child labour.

We have an Integrity Hotline and a Compliance Committee in place, both with the intention to uphold our zero tolerance approach to the violation of human rights and to safeguard those that wish to raise concerns in a safe and anonymous manner, should any modern slavery issues be raised.

We actively promote equality and diversity, fair employment practices, environmental impact management, community engagement, charitable activities and have a zero-tolerance approach to any form of modern slavery.

We adhere to the 9 points of the Ethical Trading Initiative base code. 1. Freedom of Employment 2. Freedom of association 3. Safe working conditions 4. No child labour 5. Living wages 6. Limited working hours 7. No discrimination 8. Regular employment 9. No inhumane treatment

While we are not legislatively bound by the Modern Slavery Act given our turnover level, we take this extremely seriously. We have our own Anti-Slavery policy which is strictly followed. In our own organisation, we are a Living Wage Foundation employer, and follow all recruitment and employment criteria to ensure all individuals are legally employed through valid proof to work documentation prior to beginning employment, and throughout where required.

Supplier review and on-boarding considers Modern Slavery Statements and Supplier Ethics requirements, communicated to current and potential suppliers. Responses reviewed for further analysis dependent on associated risk.

We are engaging with our supply chain and requiring them to complete a questionnaire on their approach to Modern Slavery. The results of responses will be analysed to further assess risks in the chain.

At the induction training for all new staff, issues relating to Modern Slavery are discussed. Managers who work closely with our suppliers will monitor our supply chain and are trained to identify any potential areas of concern.

We operate a full training program which includes training on all social and sustainability policies. All employees are required to read and sign an equal opportunity policy among others and receive regular updates via training sessions, notice boards and internal company intranet

All staff have completed a training course on Anti-Slavery.

Our HR team are fully trained and competent in the legislation surrounding anti-slavery including that associated with the Modern Slavery Act 2015. When recruiting a new employees, as well as legislative requirements during the ongoing employment of an individual, full process compliance is ensured.

The Purchasing director has authority under our policies to act on suppliers with proven infringements of Modern Slavery or Human rights conventions. The actions taken against a supplier will be weighted on the severity of the infringement; but in the worst situations where suppliers cannot be improved, their approval as a supplier would be withdrawn.