



Modern Slavery Act 2015: Annual Statement

INTRODUCTION

The University of Nottingham, UK ('the University') is committed to combatting modern slavery and human trafficking. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the University's modern slavery and human trafficking statement for the financial year ending 31 July 2020.

ORGANISATIONAL STRUCTURE

The University has gained an outstanding international reputation for its world-class teaching and research. The University employs around 7,700 staff, across 5 Faculties containing 41 schools and departments supported by 40 Professional Services Departments.

The 5 faculties are: Arts, Engineering, Medicine and Health Sciences, Science, and Social Sciences. The University also has six research "Beacons of Excellence" that are committed to solving today's global challenges, including the Rights Lab: the largest group of modern slavery scholars in the world, and home to the world's leading academic experts on modern slavery.

The University is a corporation formed by Royal Charter and holds charitable status. Two main bodies are involved in the governance of the University, the Council and the Senate. At the head of the University is the Chancellor and Vice-Chancellor. The day-to-day management of the University is the responsibility of University Executive Board.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

The University is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The University's Modern Slavery and Human Trafficking Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

A link to the University's anti-slavery policy can be found [here](#).

OUR SUPPLY CHAINS

The University purchases goods, services and works from a diverse range of suppliers, across a number of categories. It is recognised that the University's supply chains are global and complex when considering multi-tier suppliers, therefore Procurement have utilised the expertise of the Rights Lab to identify the highest risk areas within these categories of spend. This joint approach helps inform both the prioritisation and risk impact as the University continues to develop its due diligence processes. The University recognises modern slavery risks are present throughout the contracting lifecycle and is therefore embedding due diligence into its contract and supplier management programme.

The University also undertakes a significant amount of collaborative work with research partners and this area will also be included as part of the University's approach when adopting due diligence processes in relation to its obligations under the Modern Slavery Act (MSA) 2015.

STEPS TAKEN 2019-20

Governance

- The University has continued to support the membership of its MSA Working Group, extending membership to a representative from Research & Innovation and the new Director of Catering, Hospitality and Conferencing. In addition, it has actively engaged with the Students Union to widen the representation of the group to include our student body.
- In 2019-20, the Rights Lab published a Slavery-Free Campus Framework and accompanying Slavery-Free Campus Checklist, as part of a full research report on how universities can become slavery-free. This report builds on the learnings from the campus-wide Reading Programme and its engagement activities in 2018-19. Research for the report was conducted in two phases.

In Phase 1, a draft report investigated how universities are both affected by and engaging with the issue of modern slavery through analysis of existing literature and university Modern Slavery Statements. The Rights Lab analysed 160 UK universities, and found that 74% had produced a Modern Slavery Statement, but only 34 were up to date. The draft report made specific recommendations for steps that universities can take in the short- and long-term to become slavery-free in a new three-part Slavery-Free Campus Framework.

In Phase 2 of the research, the Phase 1 findings were explored, tested, and developed. Data was collected by select members of the Marshall Scholar Classes of 2018 and 2019 who investigated where UK universities currently sit against the draft Slavery-Free Campus Framework. This was a project led by a Marshall Scholar at the University of Nottingham during 2019-20. A 24-question questionnaire was conducted for 26 universities, including all Russell Group members. The draft Slavery-Free Campus Framework was also piloted with the University of Nottingham MSA Working Group. In piloting this Framework with the MSA Working Group in 2019-20, the authors of the report were able to see the responses and new ideas of the various professional units within the University that make up the Working Group. The Working Group then responded to the Framework by designing a new Slavery-Free Campus Checklist. This checklist operationalises the Framework into a series of practical steps, suitable for use as a dashboard that monitors progress. It assigns responsibility to different university units for the steps. Both the Framework and Checklist are available as part of the final report for all universities to use.

- Ahead of working to the Checklist in 2020-21, for 2019-20 the University identified two main KPIs to demonstrate the progress of the work it is undertaking and against which it is committed to reporting on progress:
 1. Supplier Rationalisation – wherein the University will report on the reduction in the overall number of suppliers and supply chains with the potential for modern slavery to occur. In 19/20 615 suppliers have been rationalised so far, with

more identified once new contracts go live that are currently delayed due to COVID-19. This is on track with our plans.

2. Number of contracts on the University Terms and Conditions that include MSA clauses – to contractually oblige suppliers to comply with the University's standards around modern slavery. In 19/20 84% of contracts awarded by the central Procurement register are on University Ts&Cs (excluding software). This is on track with our plans.

Managing risk in the supply chain

- A high-level risk assessment was completed against upcoming tenders which identified Lab Consumables as having very high risk multi-tiered supply chains. A complete review of the previous 4 years' spend data has been undertaken by supply chain experts in the Rights Lab and the resulting analysis is embedded into the upcoming tender specification to ensure any supplier awarded the contract is fully aware and committed to the University's requirement for all products to be sourced slavery-free.
- To further develop the annual risk review, the Procurement department initiated design work on a procurement checklist and risk assessment, along with standard tender questions to use in all future tenders where there is the potential for modern slavery in the supply chain. In addition, further work was completed to inform our Supplier Relationship Management guide to include an annual check to ensure all managed suppliers' MSA statements are up to date along with reporting of any known breaches either directly or within their supply chain.
- The Procurement department has expanded the team's capacity to assist with purchases across the University below the £100k value. This will enable a wider proportion of contracts to be awarded on University Ts&Cs which contain provisions for compliance with MSA and therefore support the University to contractually enforce MSA compliance on larger volume, smaller value contracts.
- A desktop comparison exercise was conducted of the Russell Group Universities to review the uptake of tools such as Electronics Watch and other competing tools to monitor risk in the supply chain. 25% of the 25 Universities in the comparison use Electronics Watch, another 25% use NetPositives. The University will continue to invest in the NetPositives tool as a cost effective and small and medium-sized enterprise (SME)-friendly corporate social responsibility (CSR) tool.

Awareness and training

- The Slavery-Free Campus lead for the Rights Lab helped the newly elected SU representatives bring in a policy on modern slavery through the Union council and supported the SU to build on the 2018/19 campus-wide Reading Programme on modern slavery by running a campaign aimed at students – this policy was approved by Council in November 2019.
- In 2019, the charity Lumos launched a campaign to end orphanage tourism and volunteering led by Lumos' Founder, J.K. Rowling. Lumos called on educational establishments to adopt a policy that protect their activities, educates staff and tackles family separation and 'orphanage trafficking'. Working with the University's MSA Working Group, the Careers and Employability Service amended its vacancy handling policy to include the following material: 'Please note that we do not promote or engage

in volunteering and / or visit to orphanages.’ The University also has a strict policy that any Overseas Opportunities Provider must complete additional documentation to enable us to activate their company profile on our jobs board. In 2019-20, we vetted all companies who had an active profile with us and had not completed the documentation. The Careers and Employability Service is now confident that is not advertising any companies who fit into this area but has committed to removing any from the system it may have missed. In addition, the Careers and Employability Service offers a grant to students to help fund opportunities overseas; material about not promoting or engaging in orphanage volunteering/visits has now been incorporated into that grant’s terms and conditions. The University was glad to make these changes and welcomes the feedback from Lumos that: ‘these steps will really help to make a difference. Nottingham University should be proud!’

- The University demonstrated on-going promotion and use of training to raise awareness:
 - The University continued to ensure training is available to all staff which includes a pod briefing on the University’s obligations under the Modern Slavery Act. Since its launch in 2016 we now know that more than 2250 employees have undergone this training.
 - The Procurement team were trained to a high standard to ensure compliance with MSA during procurements, with materials developed and the session delivered by members of the Rights Lab with expertise in supply chains.
 - An in-depth targeted training session for 86 members of the HR team was designed for delivery. The recorded session will remain available for use by new members of the HR team.

- Since 2017, all Management undergraduates in the Nottingham University Business School have received teaching about modern slavery in their first year as part of a compulsory module. This includes a practical exercise on the topic in collaboration with civil society partners. The teaching ran again in 2019-20. To our knowledge, we are the only UK University Business School that has included modern slavery in a mandatory module for first year management undergraduate students.

Civic engagement

- In consultation with the MSA Working Group and the University’s Civic Engagement team, the Rights Lab continued to focus locally and regionally as well as nationally and internationally in its engagement activities tackling modern slavery.

- For example, the Rights Lab collaborated with the Gangmasters and Labour Abuse Authority (GLAA), headquartered in Nottingham, on joint work about car washes, education for at-risk young people, and the creation of a protocol for the hospitality industry. It delivered content at the GLAA’s annual People Seminar, hosted this year on the University campus.

- In collaboration with law enforcement partners, the Rights Lab launched its first visiting fellowship for police officers, awarded to John Tanner from Derbyshire Constabulary, who is collaborating with the University on work to use remote-sensing data to track slavery on cannabis farms across the Midlands. The Rights Lab also works actively as a member of the East Midlands Police Academic Collaboration on the topic of modern slavery.

- In collaboration with local government, the Rights Lab completed a review of slavery and exploitation risk in adult social care contracts for the Nottinghamshire County Council. On behalf of the University, the Rights Lab also now leads the secretariat of

the Nottingham and Nottinghamshire Modern Slavery Partnership, a multi-agency group that brings together local government, law enforcement, the third sector and the University. It was asked by the Partnership to complete a Nottinghamshire Problem Profile, which brings together all locally relevant data on modern slavery as a means to focus future Partnership actions. The Rights Lab worked closely with Nottinghamshire Police on this and has now built a comprehensive local picture.

- The Rights Lab continued to deliver talks and presentations across the city and county. In 2019-20 this included an all-day event on how to work with survivors of slavery, in partnership with the survivor-led NGO the Survivor Alliance, at a city centre venue on Anti-Slavery 2019 (October 18). The half-day workshop trained people on how to move beyond transactional service provision and to empower survivors of slavery. It provided some 'nuts and bolts' for working with survivors of slavery and human trafficking from an empowerment approach. Presenters included survivor leaders from the UK Survivor Network, the Rights Lab director, and Alex Norris, MP.
- The Rights Lab has now launched the Midlands ARC (Antislavery Research Collaboration), with 19 universities across the Midlands. This large-scale collaboration had its kick-off workshop with all universities represented and has formed sub-groups of interest. It is engaging beyond its member universities with community, NGO and law enforcement partners to create a centre of gravity for externally engaged anti-slavery research in the Midlands region.

FURTHER STEPS 2020-21

Governance

- The MSA Working Group will present the new Slavery-Free Campus Checklist to the University Executive Board for endorsement of its vision of becoming slavery-free.
- The Rights Lab will actively disseminate its Slavery-Free Campus report, with Framework and Checklist, for other universities to consider adopting.
- The MSA Working Group will use the Checklist to build a multi-year plan with clear responsibilities assigned across the University units represented on the Working Group to deliver on agreed goals.
- The MSA Working Group will turn the Checklist, in combination with its on-going research into cross-sector practice and campus modern slavery risks, to develop, launch and use a modern slavery dashboard with indicators of performance for the University's operations and supply chain.

Managing risk in the supply chain

- We will report on progress to embed explicit requirements on MSA compliance into tenders for higher risk areas and the market response to this approach.
- The Procurement team will develop and implement a Supplier Code of Conduct that will detail the expectations we have for our direct suppliers and extended supply chain, to include reference to MSA.
- The Procurement team will look to integrate NetPositives into the tender process and actively require suppliers to join and complete as part of being awarded a UoN contract and enhancing the University's position on Corporate Social Responsibility.
- We will explore Research & Innovation funding streams as part of expanding the assessment of our supply chain risk.

Awareness and training

- The MSA Working Group will engage internally, communicating the University's goals for tackling modern slavery and updates on progress.
- The MSA Working Group will outline the next phase of the Training & Awareness plan, to include areas such as the University counselling team and a follow-up session with Procurement and report on progress against this.
- The MSA Working Group will work with the SU to examine student training opportunities in the area of modern slavery, and understand how modern slavery education and training can be built further into core teaching on campus beyond the course in the Nottingham University Business School (for example in Health Sciences and Medicine).

Civic engagement

- The Rights Lab will continue to collaborate in partnership with the GLAA and other law enforcement bodies on tackling modern slavery. This will include work to expand the Problem Profile (detailed assessment of data on modern slavery crime locally) beyond Nottingham to the broader Midlands region. It also will include in-depth work on the impact of COVID-19 on modern slavery risk, including local risk, and including specific forms of slavery like county-lines (child criminal exploitation).
- The Rights Lab will continue its involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership, and will complete and launch a new assessment of all UK Modern Slavery Partnerships (local multi-agency groups) in partnership with the UK Independent Anti-Slavery Commissioner that will make recommendations for good practice in tackling modern slavery at the local level.
- The Rights Lab will further support the University's civic engagement agenda through its role leading the Midlands ARC (Antislavery Research Collaboration) that brings together 19 universities from across the Midlands to deliver research that helps antislavery stakeholders to better tackle the issue of modern slavery. The Midlands ARC includes strong participation from Nottingham Trent University as part of the new Universities for Nottingham initiative, a pioneering collaboration that brings together the combined strength and civic missions of Nottingham's two world-class universities to improve the way we work with each other and with our local partners to help change the lives of local people for the better.
- Members of the Rights Lab team will continue to deliver talks and presentations across the city and county, including in collaboration with the survivor-led NGO the Survivor Alliance for national Anti-Slavery Day in October 2020.

This Statement was approved by the University of Nottingham Council on 06 October 2020.



President and Vice Chancellor, Professor Shearer West

Date: 19 October 2020