

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020-21**

### **1. Introduction**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (MSA) and sets out the steps taken by Roehampton University (trading as the University of Roehampton) during the year ended 31 July 2021, to ensure transparency in its supply chain and to prevent modern slavery and human trafficking taking place in its supply chains or in any part of its business.

This is the University's sixth annual Modern Slavery Statement since the MSA came into force. The University has never received reports of or discovered instances of modern slavery or human trafficking within its business or supply chains.

### **2. Our structure**

We are a private limited company incorporated in England and Wales, and an exempt charity. We are made up of four colleges - Digby Stuart College, Froebel College, Southlands College and Whitelands College - all of which are located in Roehampton, South-West London. Our core business is teaching and research.

In 2020-21, we had a total of 18,200 registered students (full person equivalent): of these 10,115 were on-campus students (55.6%), 7,303 off-campus students (40.1%) and 789 online students (4.3%). In 2020-21, we employed on average 960 staff.

We have three wholly-owned trading subsidiary companies: Roehampton Corporate Initiatives Limited, Roehampton Hosting Services Limited and Roehampton Construction Services Limited. We are the majority shareholder in Roehampton Pathway Campus Limited, which we jointly own with QAHE (UR) Limited. None of our subsidiary companies meet the threshold for MSA reporting.

### **3. Our Supply Chains**

We have a centralised procurement function with transactional purchasing devolved to individual departments. Our procurement is conducted by way of in-house tendering and contracting, and collaboratively through regional higher education and government purchasing consortia. We engage with our purchasing consortia to address the issues of modern slavery and human trafficking and to support the inclusion of ethical sustainability in their procurement programmes. We also include such principles within our own institutional processes and procedures.

Our supply chains mainly fall under the categories of laboratory consumables and equipment, library resources, ICT equipment and services, estates goods and services, buildings services and maintenance, and professional services.

We believe the principal areas that carry material risks are office supplies, laboratory consumables, ICT and audio-visual equipment, and some estates services, such as cleaning, catering and security services.

We rely on two carefully selected suppliers to provide our cleaning and catering services and recognise that areas of risk from them are the employment of staff to provide services at our premises and their use of subcontractors to supply goods and services. We are therefore committed to working with them to identify and report any non-compliance and to work with all statutory bodies should any investigations arise.

#### **4. Our Policies and due diligence on Slavery and Human Trafficking**

We are committed to acting ethically and with integrity in all our business and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in our business or anywhere in our supply chains.

Our policies and procedures demonstrate our commitment to combating modern slavery. Such policies include our [Dignity & Respect Policy](#); [Anti-Bribery and Corruption Policy](#); [Safeguarding Children and Vulnerable Adults Policy and Procedure](#) and [Public Interest Disclosure Policy](#). [Anti-Slavery and Human Trafficking Policy](#)

The University is a member of the London Universities Purchasing Consortium (LUPC), which in turn is a member of Procurement England Limited (PEL), the shared vehicle by which English HE purchasing consortia manage joint development and improvement projects for collaborative procurement in the sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all PEL consortia members are committed. LUPC has developed actions to identify, prevent and mitigate the risks of modern slavery and human trafficking in the supply chains of its members. LUPC has also developed a modern slavery risk assessment tool, in conjunction with the University of Greenwich, to gather information to help identify risks of human rights abuses in public supply chains.

The LUPC does not meet the turnover threshold but has published a [Modern Slavery Statement](#) as it considers that its members' spend (around £237m annually) warrants a statement on the risks inherent in its supply chains and the responsible steps it is taking to address them.

#### **5. Completed actions**

Over the last year (2020-21) our actions were somewhat restricted due to Covid and furlough. However, we completed the following actions:

- a) revised our new supplier procedures to check that where applicable new suppliers have a Modern Slavery Statement.
- b) Checked websites of our top 200 suppliers to check for their Modern Slavery Statement.
- c) All procurement staff attended the LUPC & SUPC Responsible Procurement Event on Wednesday 10 November, paying special attention of the Slavery-Free Campus created by the University of Nottingham, which goes above and beyond the legal requirements and should be a blueprint for future actions in our Modern Slavery Group.
- d) Created an Anti-Slavery and Human Trafficking Policy.
- e) All procurement staff involved in procurement have completed the Modern Slavery

Training Module from HEPA.

## **6. Progress on actions for 2020-21**

During the 2020-21 academic year, we continued our work to identify and mitigate the risk of modern slavery and human trafficking in our supply chains, and progressed various initiatives commenced in previous years to combat modern slavery. Our work included:

- (i) Contacting some of our top 200 suppliers to ascertain their levels of compliance via completion of a questionnaire. This exercise commenced in the previous reporting period.
- (ii) Continuing to develop the contracts database.
- (iii) Convening a meeting of our Modern Slavery working group to consider progress on 2020-21 actions and the further steps that can be taken by the University to ensure modern slavery compliance.

## **7. Proposed actions for 2021-22**

Work planned for the next 12 months include:

- (i) Evaluate Modern Slavery approach in tenders as part of the Sustainability/ Responsible Procurement and allocate a minimum of 5% of the total technical weighting.
- (ii) Show a link to the HEPA's Modern Slavery E-learning module in our internal Procurement website and invite users to take the training.
- (iii) Review best practice, taking the example from the University of Nottingham and look at opportunities to improve future Modern Slavery Statements.
- (iv) The continuation of actions set out at paragraph 6 ii.

This statement was approved by the University's senior management team on x xxx 2021 and the Council of the University of Roehampton on [xx xxx 2021].

**Professor Jean-Noël Ezingear**  
**Vice-Chancellor**  
**DATE: 22 November 2021**