



## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2017/18**

### **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 ending 31 July 2018, 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 third annual Modern Slavery Statement since the MSA came into force. The University has never received reports of instances of modern slavery or human trafficking within its business or supply chains.

### **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 all located in Roehampton, South West London.

Our core business is teaching and research. In 2017/18, we had a total of 22,754 registered students (full person equivalent); of these 9,248 were on-campus students (40.7%), 6,852 off-campus students (30.1%) and 6,655 online students (29.2%). In 2017/18, we employed 1148 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.

### **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 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.

### **Our Policies 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.

Since the MSA came into force, we have taken a number of steps to ensure our compliance and have taken reasonable steps to ensure that those within our supply chains are also compliant and evidence a commitment to combatting modern slavery and human trafficking. Such steps include:

- Revising of our Equality and Diversity Policy in 2016 to include an obligation to undertake contractor and supplier due diligence when selecting and evaluating contractors and suppliers; imposing a requirement on contractors/suppliers to comply with anti-discrimination legislation, related codes of practice, the Modern Slavery Act 2015, the University's relevant policies and terms and conditions for the supply of goods and services; imposing a requirement on contractors/ suppliers to demonstrate such compliance; reserving our right to terminate contracts for non-compliance with applicable laws and our policies and terms and conditions for the supply of goods and services; and undertaking to monitor and review our suppliers' compliance on a regular basis.
- Updating our standard selection questionnaire for all capital and contract purchases above the tendering threshold prescribed by the Public Contract Regulations 2015 to include questions on suppliers' policies, approaches and risk management processes.
- Updating the mandatory request for information provided to all new suppliers as part of our supplier adoption process. This is sent to all potential new suppliers and to existing suppliers in order to review their arrangements.

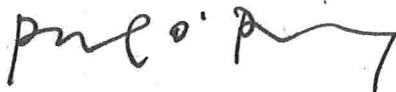
During the 2018/19 academic year, we have continued to develop our processes to identify and mitigate the risk of modern slavery and human trafficking in our supply chains, and progressed various initiatives commenced in the previous year to combat modern slavery. Key initiatives include:

- Development of a contracts database to hold all contracts for the provision of goods and services and to assign responsibility to contract managers who will be appropriately trained to identify, manage and mitigate the risk of modern slavery and human trafficking. When fully operational, this will have the functionality to identify modern slavery risks (among other risks).
- Revision of our standard term and conditions of purchasing goods and services and other relevant contract templates to include MSA compliance provisions.
- The introduction of an Anti-slavery and Human trafficking Policy. This policy further demonstrates our commitment to combat modern slavery and reflects our zero tolerance approach to slavery and human trafficking. We have other policies that support our commitment such as our Dignity and Respect Policy, Anti-Bribery and Corruption Policy and Public Interest Disclosure Policy.

Work planned or currently in progress which we aim to complete by the publication of our next annual statement include:

- Reviewing our procurement due diligence process.
- Working with our existing suppliers to confirm their supply chains and seek confirmation of their continued compliance with applicable law and our relevant mandatory policies.
- Raising awareness of modern slavery and human trafficking within our University community and among our key stakeholders.
- Developing training for a wider range of our staff.
- Publishing our revised standard terms and conditions of the provision of goods and services.
- Establishing a working group tasked with ensuring that we are successful in combatting modern slavery and human trafficking in our business and supply chains through the continued identification, assessment and mitigation of potential risks, and the continued monitoring of suppliers' compliance with applicable law and best practice.

This statement has been approved and published by the Council of the University of Roehampton and will be reviewed at least once annually.



Professor Paul O'Prey

Vice-Chancellor

18 March 2019