

## Modern Slavery Act 2015

### Modern slavery and human trafficking statement - Wrexham Glyndwr University

#### 1. Introduction

- 1.1 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.
- 1.2 Wrexham Glyndwr University is committed to improving its practices to combat slavery and human trafficking.
- 1.3 **This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Wrexham Glyndwr University's slavery and human trafficking statement for the financial year ending 31 July 2018.**

#### 2. Organisational structure

- 2.1 Wrexham Glyndwr University is a provider of Learning teaching and Research in the Higher Education Sector.
- 2.2 The University's origins can be traced back to 1887 when the Wrexham School of Science and Art first began delivering education and it began offering degrees from the University of London in 1892.
- 2.3 There were several name changes before, in 2008, the North East Wales Institute of Higher Education became Glyndwr University, making it one of the youngest universities in the UK.
- 2.4 The University delivers higher education to the people of north east Wales and the cross-border area, thus playing a crucial role in the social, economic and cultural life of the region. It also attracts significant student enrolments from other parts of the UK and internationally. It works closely with local employers to ensure that they have access to a suitably skilled and qualified workforce as well as providing research and development services in specialised areas.
- 2.5 The University is widely recognised as one of the UK's leading universities for supporting students from lower socio-economic backgrounds.
- 2.6 Welsh domiciled students continue to form an important part of the University's student population. A significant number of these are Welsh speaking or wish to improve their Welsh language skills and the University reaffirms its commitment to facilitate this. WGU is working with Y Coleg Cymraeg Cenedlaethol to achieve this, which will involve the development of additional resources and supports, enhancing academic study programmes and work placements. The University is also committed to meeting its obligations under the Welsh language Standards.
- 2.7 The vast majority of the University's students come to the University's main campus on Mold Road in Wrexham, although it also operates out of the Regent Street campus in Wrexham and sites in St Asaph, Northop and Broughton.
- 2.8 The University has a global annual turnover of £37million.

### **3. Supply chains**

- 3.1 The University is a member of both the Higher Education Purchasing Consortium Wales (HEPCW) and the North Western Universities Purchasing Consortium (NWUPC). As a member its supply chains are channeled mainly through the consortia. NWUPC has in place its own Statement on Modern Slavery and a copy of this is attached at Annex one of this document.
- 3.2 HEPCW is looking to create its own compliance statement, but this is currently a work in progress. The University also on occasion procures on a smaller scale from organisations outside of the consortia and it is in the process of carrying out a supply chain mapping exercise, which in turn will inform a risk assessment analysis in respect of those supply chains outside of the consortium.

### **4. Policies on slavery and human trafficking**

- 4.1 The University is committed (in so far as reasonably possible) to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.
- 4.2 In light of the obligation to report on measures to ensure that all parts of its business and supply chain are slavery free the University has reviewed its workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.
- 4.3 Those workplace policies and procedures demonstrate the University's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure (in so far as reasonably possible) slavery and human trafficking is not taking place anywhere in its supply chains.
- 4.4 The University operates the following policies that contribute to its approach to prevent slavery and human trafficking in its operations
- 4.4.1 Whistleblowing policy.** This policy provides safeguards to enable staff to raise concerns about malpractice in connection with Wrexham Glyndŵr University. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally without fear of repercussions to the individual, even if their concerns turn out to be mistaken. Wrexham Glyndŵr University is committed to the highest standards of honesty and integrity openness and accountability and encourages its staff to raise genuine concerns about malpractice at the earliest practicable stage in the knowledge that their concerns will be taken seriously and investigated. Malpractice within the University is taken very seriously.
- 4.4.2 Employee code of conduct.** This is enshrined in a Staff Charter the purpose of which is to make explicit the expectations of the University from its staff, and importantly, to share the University's commitments to its staff.
- 4.4.3 Recruitment and Selection Policy.** The University is committed to attracting and retaining high performing staff who can make a valuable contribution to its on-going success. The Policy and the Procedure for the Recruitment and Selection of Staff together provide a framework for the achievement of excellence in all aspects of the University's recruitment practices.
- 4.4.4 Procurement Policy** The procurement function of Glyndŵr University will provide professional procurement expertise to the Board of Governors, Executive and staff. It will contribute fully to the achievement of the Board's aims and objectives and will continue to raise the profile of procurement throughout the University, ensuring that the Board's business needs are met through its purchasing of goods, services and contracts and that the Welsh Government's Policy aims and objectives are core to its procurement activity. It will also have reference to the requirements of Higher Education Funding Council for Wales (HEFCW) and the University's environmental, sustainable and ethical objectives. The Procurement Advisor at Glyndŵr University is a member of HEFCW's Ethical Employment in Supply Chains Working Party which has been formed to provide a forum for discussion

and implementation of the Code of Practice: Ethical Employment in Supply Chains amongst the Welsh HE Sector community. The Terms of Reference for the Group is attached at Annex Two of this document. The Procurement function will proactively manage and develop its suppliers and supply base, identifying and managing any supply risks.

- 4.4.5 Anti- Bribery Policy.** The University is committed to ensuring that high standards of integrity apply in all of its areas of operation and that all of its business is conducted in an honest and transparent manner. As an educational establishment and a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the University is concerned to protect itself and its funders, donors, employees and students from the detriment associated with bribery and other corrupt activity. It is therefore committed to preventing bribery and fraud by staff and any third party performing services for, or on behalf of the University. The University recognises that the risk of bribery and fraud will arise in various contexts and will seek to advise, inform and/or train its employees appropriately to assess the risk of bribery and fraud being practised and implement practices which reduce the risk of it occurring or being undetected where existing processes are not already in place.
- 4.4.6 Treasury Management Ethical Investment Policy.** The University requires its officers to pay appropriate regard to relevant corporate governance, social, ethical and environmental considerations in the selection, retention, and realisation of all treasury investments. The Board of Governors' Strategy and Finance Committee expects this to be done in a manner which is consistent with the University's investment objectives and legal duties.
- 4.4.7 Value for Money Statement.** Glyndwr University recognises its responsibility to achieve value for money (VFM) from all its activities, however they may be funded. Specifically, there is a duty of care to ensure that public funds are spent on the purposes for which they are intended and that good value for money is being obtained. The University is also committed to the purpose of economy, efficiency and effectiveness in its corporate and academic activities. It will seek to adopt good practice and incorporate VFM principles in all its activities.
- 4.4.8 Regulations on Research Practice.** Glyndwr University subscribes to the UK Research Integrity Office's Code of Practice for Research published in September 2009. The CoP applies to research organisations and to researchers, and will endeavour to meet all the obligations which the Code places on research organisations. All research conducted in or under the auspices of the University requires ethical review and approval before data collection may begin. In particular, those leading or supervising research which involves human participants (including but not limited to questionnaires, interviews, human samples and clinical research) or non-human animals must ensure approval by the University's Research Ethics Sub Committee as required by the RESC Guidance in force at the time, together with any external review and/or approval required in the field of study concerned, before beginning the research.

## **5. Due diligence processes for slavery and human trafficking**

5.1 As part of its initiative to identify and mitigate risk the University is working with the North Western Universities Purchasing Consortium and associated suppliers to:

- Assess potential risk areas in its supply chains
- Mitigate the risk of slavery and human trafficking occurring in its supply chains
- Monitor potential risk areas in its supply chains
- Protect whistle blowers.

## **6. Supplier adherence to University values**

6.1 The University has zero tolerance to slavery and human trafficking. To ensure all those in its supply chain and contractors comply with its values it has in place a system of

procuring from the two purchasing consortia, highlighted in section 3 above, whenever possible and plays an active role in working with the consortia to ensure their policies when placing contracts adhere to the insistence of compliance with the Modern Slavery Act.

## **7. Training**

7.1 The Procurement Advisor is also undertaking additional training to obtain MCIPS "**Chartered Status**" to evidence commitment to ethical procurement and supply practice. To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and its business, the University intends to provide training to other identified staff. It will also recommend that its business partners provide training to their staff and suppliers and providers.

## **8. Effectiveness in combating slavery and human trafficking**

8.1 Notwithstanding the areas identified in this document the University intends to review and develop, throughout the next financial year, each of the key commitments identified in the Welsh Governments Code of Practice for Ethical Employment in Supply Chains and use them as a set key performance indicators (KPIs) to measure how effective it has been ensuring (as far as reasonably possible) that slavery and human trafficking is not taking place in any part of the University business or supply chains:



**Maxine Penlington OBE**  
**Chair, Board of Governors**  
**Wrexham Glyndŵr University**

**Date: 30<sup>th</sup> November 2018**

## North Western Universities Purchasing Consortium

### NWUPC Ltd Modern Slavery Statement 2016/2017

This statement has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It sets out the steps taken by North Western Universities Purchasing Consortium Limited (NWUPC Ltd) during the financial year ending 31<sup>st</sup> July 2017 to prevent modern slavery and human trafficking in our business and supply chains.

#### Introduction

Slavery, servitude, forced labour and human trafficking (Modern Slavery) are issues of increasing concern, pertinent to all regions, sectors and economies. NWUPC Ltd is committed to a Sustainable Procurement Policy, adopted by all consortia members of Procurement England Limited (PEL), our shared vehicle for managing developmental and improvement projects for collaboration in English higher education procurement; and a zero tolerance approach to modern slavery within our supply chains.

#### Our Structure and Supply Chains

43 Members	26 Frameworks	207 Suppliers	+ £200Million Spend
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North Western Universities Purchasing Consortium (NWUPC Ltd) is a non-profit, professional buying organisation owned by its Members, for its Members, in the higher and further education, arts, sciences, health and cultural sectors. NWUPC Ltd exists to provide a structure for its members mutually to secure value for money through the collaborative procurement of goods and services, without causing harm to others.

Although NWUPC Ltd has an annual turnover far less than the threshold for the requirement to publish a statement under the Act, annual spend by our Members through NWUPC Ltd supply agreements, in excess of £220 million, warrants a statement on the risks inherent in our supply chains and the steps we are taking to address these.

Our supply chains fall under the following category areas:

ICT Equipment and Services	Estates and Facilities Management	Laboratory Consumables and Equipment	Professional Services
Office Supplies and Equipment	Library Resources	Travel	

## ANNEX 1

All the Frameworks within these categories have differing levels of risk attached. This risk has been assessed using the Marrakech Approach. Within the strategy documents for each Framework, the risk level is determined and appropriate actions considered.

### Policies and Contractual Controls in Relation to Slavery and Human Trafficking

We continue to develop our Sustainable Procurement Strategy and remain committed to supporting the UK Government's National Action Plan to implement the UN Guiding Principles on Business and Human Rights. We are scheduled to update our Responsible Procurement Policy and Strategy, with the addition of an Anti-Slavery and Human Trafficking Statement.

### Due Diligence Processes in Relation to Slavery and Human Trafficking

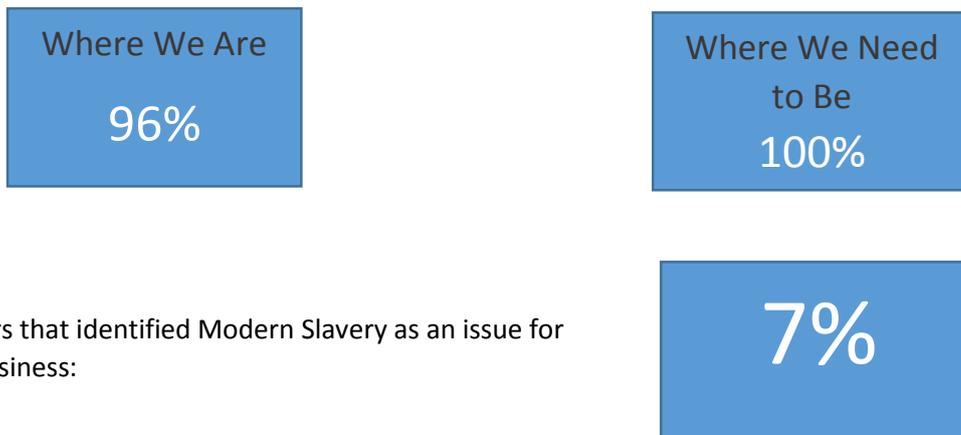
As part of our first year reporting exercise we expressed a commitment to better understand our supply chains beyond the first tier and to work to ensure greater transparency and responsibility towards the people working in them. This commitment is reiterated in our second year and is supported by the following:

Issue Identified	Action Taken	Future Commitment
<i>Absence of Supply Chain Transparency</i>	Incorporation of questions in all of our standard tendering documentation requiring disclosure of, at a minimum, Tier 2 suppliers	Supply chain mapping of all suppliers on framework agreements identified as high risk
<i>Absence of oversight and detail on audit methodology</i>	Incorporation of question on supply factory auditing including third party auditing	Requirement for the provision of audit reports
<i>Supplier perception of Modern Slavery obligations being confined to Section 54 reporting requirement</i>	Incorporation of question on supplier compliance with the Modern Slavery Act including training, risk assessment, due diligence and policies to capture suppliers outside the minimum financial turnover	Engagement and education campaigns with suppliers to expand on their understanding of Modern Slavery going beyond a statement

## Action taken to Address Modern Slavery

NWUPC Ltd continue to utilise the NETpositive Supplier Engagement Tool to proactively respond to the Modern Slavery Act within our supply chains. We interpret the commitment to the eradication of Modern Slavery in broader terms than as prescribed under the Act and encourage all suppliers, irrespective of annual turnover, to make a public commitment to take action against Modern Slavery. The tool allows us to understand the percentage of suppliers who acknowledge Modern Slavery is an issue for their business, to identify resultant actions to be taken by them to address Modern Slavery; and to ascertain those suppliers that do not acknowledge Modern Slavery as a consideration.

Awareness of the Modern Slavery Act amongst our supply base:



As a first point, this data has allowed us to differentiate responses by business type and the prioritisation of suppliers in higher risk areas. Going forward, NWUPC Ltd will utilise this data to target those organisations that select that Modern Slavery is not an issue for their business with an education campaign on the prevalence of Modern Slavery.

## Training on Modern Slavery and Trafficking

- NWUPC Ltd Contracting team completed the Chartered Institute of Purchasing and Supply online Ethical Procurement and Supply training module.
- All members of the organisation watched the Gangmasters and Labour Abuse Authority's video HorseTrading.
- Members of the NWUPC Ltd Heads of Procurement Category Group received a presentation from Andy Davies, Director, LUPC on the Modern Slavery and Public Procurement

**Julie-Ann Garton**

Managing Director

North Western Universities Purchasing Consortium Limited

## **HIGHER EDUCATION PURCHASING CONSORTIUM WALES (HEPCW)**

### **Code of Practice: Ethical Employment in Supply Chains Working Party Terms of Reference**

#### **Context**

The Code of Practice has been established by the Welsh Government to support the development of more ethical supply chains to deliver contracts for the Welsh public sector and third sector organisations in receipt of public funds.

The Code is designed to ensure that workers in public sector supply chains are employed ethically and in compliance with both the letter and spirit of UK, EU, and international laws. The Code covers the following employment issues:

- Modern Slavery and human rights abuses
- Blacklisting
- False self-employment
- Unfair use of umbrella schemes and zero hours contracts and
- Paying the Living Wage

In signing up to the Code, organisations will agree to comply with 12 commitments designed to eliminate modern slavery and support ethical employment practices. All of the Higher Education Institutions in Wales have signed up to the Code.

The Working Group will provide a forum for members to work collaboratively on those elements of the Code which have a direct impact upon procurement processes. A key objective underpinning the Group's activities will be the effective use of resources and sharing of best practice and information.

#### **1. Constitution**

##### **1.1 Membership**

Membership of the Group will comprise at least one representative from each "full" member institution. "Associate" members and representatives from external organisations may be invited to participate at the discretion of the Group Chair.

##### **1.2 Chair**

The Chair, in conjunction with the Secretary, shall lead the Group to ensure that progress is made with the agreed programme of activities; that the Group representatives are encouraged to actively participate; and that the overall conduct of the Group is efficient and effective. The Chair will serve for a period of three years.

On the expiry of the agreed period of duty for the Chair, a new Chair shall be elected, or incumbent Chair re-elected.

### **1.3 Accountability**

The Group will be accountable to the Procurement Heads Group and will report to them at regular intervals.

### **1.4 Secretary**

The Group shall appoint a Secretary for an agreed period. The Secretary shall generally facilitate the operation of the Group; agree the agenda in conjunction with the Chairman; prepare or oversee the preparation of Minutes of the meetings; and ensure that appropriate progress is made by the Group in accordance with its programme of activities.

### **1.5 Secretarial Services**

The members of the Group shall agree arrangements for secretarial services either amongst themselves or, exceptionally, with the HEPCW Procurement Manager's office.

### **1.6 Meetings**

The group shall normally meet quarterly or as agreed by the group depending on work plans and timescales.

## **2. Terms of Reference**

2.1 To provide a forum for discussion and implementation of the Code of Practice: Ethical Employment in Supply Chains amongst the Welsh HE Sector community.

2.2 Work with the members to ensure all relevant statutory requirements, including publication of annual Modern Slavery Statement are achieved.

2.3 Consider and implement efficient and effective means of working via appropriate collaboration.

2.4 Monitor and report progress made on institutional action plans.

2.5 Encourage regular review of institutional terms and conditions to ensure that they take account of the obligations adopted under the Code of Practice.

2.6 Develop and maintain standard documentation.

2.7 Identify and maintain single data repository for information and document sharing.

2.8 Collaborate externally as appropriate, either with other Wales based organisations that are signed up to the Code, or with other HE sector bodies.