

MODERN SLAVERY STATEMENT

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.

St Mary's is committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University's modern slavery and human trafficking statement for the year ending 31 July 2017.

St Mary's has demonstrated its wider commitment to addressing the complex issues around Modern Slavery by setting up a Centre for the Study of Modern Slavery to encourage learning and research on this subject.

Our policies on modern slavery and human trafficking

St Mary's has a zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains and to raising awareness of these issues across the University, with suppliers, and the wider community.

Due diligence processes for modern slavery and human trafficking

Working Group

As part of our initiative to identify and mitigate risk in this area the University has a Modern Slavery working group consisting of representatives from across the University. The working group has responsibility for:

- Receiving information about the Act, including Government and legal guidance and disseminate this to staff.
- Co-ordinating the steps that the University will take to combat modern slavery and human trafficking.
- Arranging relevant training for staff.
- Preparing anti-slavery and other corresponding policies for publication on the University's website.
- Reporting to senior management team on the actions taken and their outcomes.
- Arranging for the preparation and publication of the annual statement as soon as reasonably practicable after the financial year end.

Identified Risks and mitigation actions

Supply chains

Our supply chains include;

- Estates/Facilities Supplies & Services
- ICT Equipment & Services
- Building Works/Construction
- Catering Supplies
- Stationary & Office Equipment
- Books & Periodicals

The University supply chain is wide and diverse with many products sourced from overseas, as such it has been identified as an area of risk. The following mitigation is in place or planned.

Strategy

The procurement function is supported by a published Procurement Strategy. The University is committed to this strategy and the policy will be reviewed to reflect the requirements of the Modern Slavery Act.

Purchasing Consortium membership

The University is a member of the Southern University Purchasing Consortium (SUPC) which in turn is a member of Procurement England Ltd (PEL), the shared vehicle by which English higher education purchasing consortia manage joint development and improvement projects for collaborative procurement in our sector. Together, the purchasing consortia have published a shared Sustainability Policy to which all PEL members consortia are committed and the SUPC has published its own statement on Slavery and Human Trafficking.

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The University uses the SUPC framework agreements and other purchasing consortia for its purchasing requirements and plans to continue and expand this use. The procurement team will continue to work with SUPC and others on sustainable & ethical policy and implementation.

Supply Chain

As part of our normal procurement policies and procedures, we vet suppliers to ensure they comply with the relevant legislation.

Staff

Directly employed (including establishment and non-establishment staff)

The University operates a number of policies and procedures to ensure that we act in an ethical and transparent manner at all times. All our HR policies guide staff members on the expected standards of conduct and behaviour. Of particular note are:

- A robust Recruitment Policy and Procedure, incorporating employment checks such as right to work and disclosure requirements for the relevant roles. The University is an accredited London Living Wage Employer, and all our employment practices are compliant with UK legislation.
- Public Interest Disclosure Policy (Whistleblowing), through which staff can report any concerns about suspected slavery and trafficking.

Agency and Other

Agency staff, self-employed contractors and consultants are recruited using regulated processes and through established and accredited sources and framework suppliers (e.g. SUPC).

This statement was approved by the Board of Governors of the University on 9 November 2017.