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 2018.

About the University
St Mary’s University is a higher education institution that has approximately 5000 students and approximately 1000 staff. The main campus is in Strawberry Hill with other building used for office, commercial, and teaching use within the Twickenham area.

The University’s turnover for 2017/2018 was £52.5m. The University has two subsidiary companies, Strawberry Hill Enterprises Limited and St Mary’s College Residences PLC. Neither of these has a turnover in excess of £36m so are not required to produce a modern slavery statement.

The University has well established collaborative partnerships with other institutions in the following countries:- Australia, France, and the USA.

We have also launched St Mary’s University London International College (“SMULIC”) which will provide a range of foundation courses in partnership with the Holmes Institute.

The University does not currently outsource its services.

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.

St Mary’s complies with all applicable employment law relating to employee terms and conditions, including pay. The University has an anti-slavery and human trafficking policy and it also has the following supporting policies:-
Equality and Diversity Policy Statement and Code of Practice.
Public Interest Disclosure Policy through which staff can report any concerns about suspected slavery and trafficking.
Recruitment Policy and Procedure, incorporating employment checks such as right to work and disclosure requirements for the relevant roles.
Anti-Bribery Policy.

These policies apply to all employees, contractors, sub-contractors, and agency staff.

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 is currently being 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.
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. We will now begin engagement with suppliers in our high priority categories to ensure that they are aware of and (where relevant) in compliance with the Modern Slavery Act, and are taking all necessary action in order to address and mitigate the risk of exploitation within their operations and supply chains.

The University has begun undertaking an in-depth supply chain mapping exercise to identify, assess and monitor potential risk across all areas. The University has already identified the following supply chain categories as high priority: 1) Construction/Building works 2) Catering supplies 3) ICT equipment. A briefing has been produced to explain potential risks of modern slavery within these supply chains. Suppliers to these categories will be focused upon as a priority over the next year and within our ongoing supplier engagement strategy.

Agency and Other staff
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 has been considered and approved by the Senior Management Team with final approval by the Board of Governors of the University on 24 January 2019.
APPENDIX TWO

Anti-slavery and human trafficking policy

1. POLICY STATEMENT

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. St Mary’s has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee’s contract of employment and the University may amend it at any time.

2. RESPONSIBILITY FOR THE POLICY

2.1 The Board of Governors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Head of Procurement has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.
2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager or the Head of Procurement as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Head of Procurement as soon as possible. If you feel unable to report a suspected breach to your manager then you can make a report under the University’s Public Interest Disclosure (Whistleblowing) Policy.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or with the Head of Procurement.

3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Clerk to the Board of Governors or the University Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on Staffnet.
4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, may be provided to employees and other individuals who work for us. Staff members are expected to complete such training when required.

4.2 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy, subject to contractual terms.

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