



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 2019.

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 buildings used for office, commercial, and teaching use within the Twickenham area.

The University's turnover for 2018/2019 was £52.3m. 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 with responsibilities covering the entire 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
- Recruitment Agency Services

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,



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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.

The University has undertaken an in-depth supply chain mapping exercise to identify, assess and monitor potential risk across all areas. The University has 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 and our procurement process has a particular focus on these areas.

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 30 January 2020.