



MODERN SLAVERY ACT 2015

Modern Slavery and human trafficking statement

Introduction

This statement constitutes Harper Adams University's slavery and human trafficking statement for the financial year ending 31st July 2020. The University is legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015. Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour 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.

This statement sets out the steps the University has taken, and will take in the coming year, to address this issue. It covers both our own workforce and how we will address modern slavery in our supply chains.

Organisational Structure

Harper Adams University is a public university and as a charity operates on a 'not for profit' basis. The University delivers higher education in support of agricultural, agricultural engineering, food science and technology, environmental sciences, veterinary science and land-based sectors. Its primary activities are the provision of world class teaching and research.

Our Recruitment Practices

We have robust recruitment procedures in place to ensure that there is no possibility of slavery in our institution's workforce and we are committed to continuing to use our procurement activities to combat modern slavery in our supply chains.

We directly employ circa 600 employees and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our Human Resources (HR) department and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees have to provide 'right to work' information which is checked at interview. Interviews are conducted face-to-face if possible which confirms that individuals have freely chosen to attend. All application forms are verified as being the applicant's own information, including taking a copy of the interviewee's original passport and any additional 'right to work' documentation (where applicable).

Where interviews are conducted via 'Teams' or other electronic means, the candidate is required to present their original passport and other additional 'right to work' documentation (where applicable) in person to HR before their start date or on their first day. All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.





We have implemented alternative procedures for right to work checks following the publication of new COVID-19 guidance by the Home Office in March 2020 that temporarily removes the requirement for in-person checks.

These actions mean that we can be confident in stating that there is no modern slavery in our directly employed workforce.

Our Supply Chains

We have zero tolerance to slavery and human trafficking. The University purchases from over 1,750 different suppliers each year. The suppliers who we directly purchase from are known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (2nd tier, 3rd tier and so on) to produce and offer the goods, services and works that the University requires. Our 1st tier suppliers range from locally based micro businesses through to large global companies. Our supply chains mainly fall into the following categories:

- ICT Equipment and Services
- Estates and Facilities Goods and Services
- Laboratory Consumables and Equipment
- Library Resources
- Professional Services
- Agricultural Goods and Services

In order to identify risks and provide mitigation the University requests all new suppliers to agree to our standard terms and conditions for goods and services reflecting our commitment to addressing Modern Slavery and to require its suppliers to comply with Modern Slavery legislation and address the risks of the same.

All University Tenders require tenderers to confirm the Organisation's policy to comply with their statutory obligations under the Modern Slavery Act 2015.

Our ICT and Estates departments are responsible for many of our high value contracts with suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including capital works, facilities management, building maintenance and energy. Our other high value expenditure categories include agricultural equipment and consumables, laboratory equipment and consumables, library materials, food supplies and professional services.

The vast majority of our purchases are from suppliers based in the UK. The Walk Free Foundation (who campaign on modern slavery) have profiled modern slavery risks in the UK, and UK based industrial supply chains are not a common source of modern slavery. Whilst we cannot categorically state that there is no modern slavery in our 1st tier suppliers, we assess the risk of this as being low.

Only a small proportion of the University's purchases are from overseas suppliers. Typically the overseas suppliers we use operate in high-tech industries in developed countries where the risk of modern slavery is less prevalent.

Suppliers in less developed countries can pose a greater risk of modern slavery. In the last financial year, we used only a minimal number of 1st tier suppliers located in the countries identified by the Walk Free Foundation's 2018 index as having the highest proportion of their population in modern slavery. We assess our exposure to be limited.



Actions taken in this Financial Year

We continue to keep ourselves aware of the developments taking place in the higher education procurement consortia. These are buying groups who aggregate the purchasing power of universities to improve value for money and increase our ability to influence suppliers. The consortia are an important part of our approach to modern slavery as we use their contracts for many commonly purchased items where modern slavery may be present in the supply chain (e.g. office stationery; IT hardware; laboratory consumables etc.). Effectively the University will be delegating its modern slavery supplier due diligence to the consortia for these products. We have seen evidence that the consortia have processes and procedures to tackle modern slavery and are confident that appropriate actions are being taken by them.

The North Western Universities Procurement Consortium offer membership of Electronics Watch on behalf of its full and associate members. Electronics Watch brings together public sector buyers and civil society organisations in electronics production regions with experts in human rights and global supply chains. They guide public procurement demand for decent working conditions in electronics supply chains and provide unparalleled capacity for public buyers to follow up on contractual demands through worker-driven monitoring which helps workers to voice complaints and contribute to solutions.

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We will continue to review suppliers where spend is over £100k is undertaken to ensure that, where required, they have shared their respective Statements on Modern Slavery

During 2021 we will continue to review and identify key staff involved in HR Recruitment and Procurement Activities to ensure that those staff complete the online training modules "A Guide to Modern Slavery" and "Protecting Human Rights in the Supply Chain" both of which are accessible via Professional HE Services to ensure that we raise awareness of our obligations under the Modern Slavery Act 2015

We will also review relevant policies during 2021 to ensure they also reference our obligations under the Modern Slavery Act 2015

The Chief Financial Officer is the person with overall responsibility for compliance on behalf of the University in relation to tackling Modern Slavery. Any concerns from suppliers, university students or staff or any third parties regarding Modern Slavery in relation to the University should be directed to Liz Furey, Chief Financial Officer, in the first instance.

This statement has been approved by the University's Board of Governors and will be reviewed annually.

Mr Peter Nixon, Chair of the Board
On behalf of Harper Adams University
Date: 26 November 2020