



Swansea University
Prifysgol Abertawe

Modern Slavery Act 2015

Annual Modern Slavery and Human Trafficking Statement 2021/22

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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st July 2022.

Swansea University takes a zero tolerance approach towards modern slavery.

Organisational Structure

Swansea University is an ambitious, research-intensive institution with more than 20,000 students and over 4,000 staff.

The University's governing body, the Council, has general control over the University and its affairs, purposes and functions.

The Senior Leadership Team has operational responsibility for the University, consisting of the Vice-Chancellor, the Provost, the Pro-Vice-Chancellors, the Registrar and Chief Operating Officer and the Chief Financial Officer. This body provides a forum for advising the Vice-Chancellor and other senior officers of the University on matters relating to their portfolio responsibilities.

The University's financial statements can be found at <http://www.swansea.ac.uk/finance/financialstatistics/>

Supply Chains

Swansea University has a global supply chain, comprising of a range of suppliers delivering goods, services and works to the University.

Our policies on slavery and human trafficking

During the year to July 2021 the University acted responsibly to ensure compliance with the Modern Slavery Act 2015. Swansea University is committed to working towards ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure all parts of our business and supply chain are slavery free, we will continue to review our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. The publication of this statement is also a requirement of the Welsh Government Ethical Employment in Supply Chains Code of Practice, which the University committed to becoming a signatory to alongside all Universities in Wales in July 2017. Swansea University is working towards achievement of the commitments of the Code of Practice, which includes encouraging our suppliers to adopt the Code.



Due diligence processes for slavery and human trafficking

Swansea University undertakes to consider due diligence processes in our own business and that of our supply chain. We are putting systems in place to identify, assess and monitor potential risk areas in our supply chains in order that we continue to mitigate those risks.

Swansea University is a member of the Higher Education Purchasing Consortium Wales (HEPCW). HEPCW works effectively alongside its counterpart UK Universities Purchasing Consortia. The joint contracting programme provides a comprehensive and mature collaborative portfolio, which includes some of the high-risk categories such as office supplies, laboratory consumables, ICT equipment and some estates (facilities management) services.

Swansea University is working collaboratively with HEPCW and within the HE Purchasing Consortia to identify the suppliers in these high-risk categories, in relation to slavery and human trafficking, and has signed up to the Welsh Government's Transparency in Supply Chains (TISC) Register.

Tenders conducted by Swansea University require bidders to confirm compliance with the Modern Slavery Act 2015 as part of a mandatory requirement of the selection process, and all new suppliers to the University are also required to confirm their compliance with the Legislation.

NetPositives

Working with the wider Welsh Higher Education Purchasing Consortium, the University has engaged NetPositives to deliver an interactive database of current suppliers in order to assess their conformance with the Modern Slavery Act 2015. The system will:

- Provide a single mechanism to engage contracted and non-contracted suppliers with the issues of Modern Slavery
- Collect data on which of our suppliers are aware of and engaged with aspects of modern slavery
- Provide a mechanism to offer support, guidance or training to our supply base and to share best practice between them
- Enable us to track the actions being taken and progress being made by our supply chain in addressing aspects of modern slavery
- Provide us access to this information in real time
- Allow us to build modern slavery into our contract management processes based on the action plans developed by our suppliers

Mitigating risk by supplier adherence to our values

Many of our suppliers in these higher-risk categories have committed to the Base Code of the Ethical Trading Initiative (ETI) and the UK Universities Purchasing Consortia are working to persuade the remaining suppliers in



these categories to join them. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.

Swansea University was the first in Wales to achieve Fairtrade status. The University's Campus Catering service has a strong commitment to sustainability, Fairtrade, and to local purchasing. Fairtrade is about better prices, decent working conditions, local sustainability and fair terms of trade for farmers and workers in the developing world.

In addition, Swansea University was the first Welsh organisation to affiliate to Electronics Watch. [Electronics Watch](#) is an independent monitoring organisation that helps public sector buyers work together to ensure respect for labour rights and safety standards in factories that make the ICT hardware they buy. By operating on an affiliations basis, Electronics Watch allows public buyers to share the cost of monitoring suppliers with the whole network of affiliates and coordinate industry engagement. Swansea University is working in affiliation with Electronics Watch to therefore develop transparency through its supply chain to lower tier suppliers, to mitigate the risk of unethical employment practices, for example conflict minerals supplied to electronics manufacturers.

Real Living Wage

The real living wage is independently calculated based on what employees and their families need to live and is higher than the national living wage set by the UK Government. Updated annually, accredited employers pay the real living wage rate on a voluntary basis.

Swansea University voluntarily implemented the real living wage for all its salaried employees in April 2019, benefitting more than 1,000 of its lowest paid employees. Since then, it has gained its real living wage accreditation from the Living Wage Foundation (LWF) by paying the real living wage to all directly employed staff and also those who have been subcontracted.

Swansea's accreditation from the LWF, which came into effect on 1 June 2020, will allow the University to promote and encourage policies and practices which are an important part of helping its 4,000 staff to lead fulfilling and rewarding working lives. The University is also currently developing a plan to roll out the real living wage across third party contracts as they come up for renewal.

Accredited real living wage employers report that becoming accredited has helped relations between staff and their managers, has led to an increase in motivation and retention rates, and has helped boost the reputation of their organisation.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we will continue to raise awareness of modern slavery.

The Procurement and Sustainability teams work closely to develop internal awareness training, utilising relevant resources, and to strengthen internal policies and procedures in line with ISO standards.

This awareness raising is aimed at relevant levels and roles within the University. By identifying staff involved in the buying process, training is provided to aid awareness, and to help in identifying risks in the supply chain that they are part of.

Our effectiveness in combating slavery and human trafficking

Swansea University has begun to integrate the Modern Slavery Act 2015 into our ISO14001 (2015) Environmental Management System and Legal Register, which will:

- support identification and mitigation of associated impacts and the development of University-wide key performance indicators for performance management
- provide externally audited assurance
- provide a mechanism to increase awareness throughout the University community
- consider appropriate legal clauses in contracts to manage and monitor suppliers more effectively.

Our Governance & Policies

- [Sustainable & Ethical Procurement Policy](#)

This policy is integral to our procurement activities and was developed in collaboration between the Procurement and Sustainability teams.

Further steps for 2021/22

In the next Financial Year the University will be implementing its revised Whistleblowing Policy and will consider ways to widen the scope to include supply chain in relation to the Modern Slavery Act.

The University is currently reviewing its Procurement Strategy and will implement sustainable ethical procurement practices which will include the requirements of the Modern Slavery Act. This will specifically include:

- Governance structure
- Risk assessments associated to categories
- Supplier assessment
- Training

Swansea University is committed to further developing understanding and effectiveness in this area, with an aim of achieving greater transparency within our supply chains and acting responsibly towards people working within them.



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Swansea University will continue to assess key risk areas within our spend portfolio and develop strategies to mitigate any potential risk.

Bleddyn Phillips
Pro-Chancellor and Chair of Council

