

UNIVERSITY OF KENT

Modern Slavery Act 2015 - Modern Slavery and Human Trafficking Statement

At its meeting on 26 November 2021 Council considered a Modern slavery and human trafficking statement and authorised the Chair of Council to sign the statement on its behalf. The following is the annually approved statement, which was signed by the Chair of Council, 26 November 2024.

Modern Slavery and Human Trafficking Statement

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.

The University of Kent is committed to ensuring that there is no modern slavery or human trafficking in its supply chains, corporate activities or in any part of its business, and reviews its workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Organisational structure

The University of Kent is an exempt charity regulated by the Office for Students on behalf of the Charity Commission for England and Wales. The University's Royal Charter of 1965 established the University Council as the supreme governing body of the institution. The University Council serves as the University's board of trustees and has overall responsibility for the University's strategic aims and direction in the furtherance of the objects defined by the Charter.

From the Royal Charter, the objects of the University are;
"to advance education and disseminate knowledge by teaching, scholarship and research for the public benefit."

The University has an annual income of £268.4m (financial year end 31 July 2024), has the equivalent of 2,900 full time employees and, as well as campuses in Canterbury and at Medway within the UK, the University of Kent has a specialist postgraduate centre in Paris.

A central Procurement team has been established at the University. The team reviews all processes and procedures, including those around selecting and managing suppliers, to make sure that they comply with the requirements of the Act.

The University has devolved purchasing in its Schools/Divisions and Professional Service Departments and buys a wide range of goods and services, from research equipment to food items. The central Procurement team works with all areas of devolved purchasing activity so that they are aware of the requirements in selecting and working with suppliers.

Policies on slavery and human trafficking

The University of Kent reviews its policies and procedures to ensure that they adhere to the University's commitment to acting ethically and with integrity in all of its business relationships, and to implementing and enforcing effective systems and controls to minimise the risk of slavery and human trafficking taking place anywhere in the University's supply chain.

The University has updated its external website with information regarding modern slavery and information around legislative and regulatory compliance:

<https://www.kent.ac.uk/finance/responsible-procurement>

The University has the following existing policies that help to minimise the risk of modern slavery and human trafficking in its operations:

- Whistleblowing Policy

The University encourages all of its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that might give rise to an enhanced risk of slavery or human trafficking. The University's Whistleblowing Policy is designed to make it easy for workers to make disclosures, without fear of retaliation.

<https://media.www.kent.ac.uk/se/45163/Whistleblowingpolicy-updatedAugust2024.pdf>

- Codes of Conduct

The University's employee Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation.

<https://www.kent.ac.uk/about/governance/policies-and-procedures>

The University strives to maintain the highest standards of employee conduct and ethical behaviour when operating both at home and overseas, and in managing its supply chain. The Supplier Code of Conduct, can be accessed at:

<https://media.www.kent.ac.uk/se/34193/SupplierCodeofConductFinalVersionSeptember20192.pdf>

Information for Prospective Suppliers can be found at :

<https://www.kent.ac.uk/finance/information-for-suppliers>

- Recruitment Procedures

The University's Recruitment Procedures ensure that the recruitment of new employees is in line with a consistent and transparent process that requires corporate oversight and approval. All chairs of recruitment panels are trained to ensure that workers are appointed to authorised roles in line with corporate terms and conditions.

Supply chains

The University of Kent's supply chain includes a total of 2,373 separate suppliers across all of the requirements of the University. The University has standardised its methods for procuring goods and services by extending the use of IT (UBW Purchase Order Processing) to facilitate compliance with EU and UK regulations. A training programme has been provided for purchasers that has resulted in a significant reduction in manual payments and an improvement in management information.

The University has mapped its supply chain for compliance with the Modern Slavery Act and investigates, where appropriate, any potential breaches of this Act. The Modern Slavery position of the biggest 300 suppliers is assessed/refreshed annually.

Collaboration

The University works with a number of collaborative professional buying organisations such as Crown Commercial Service (CCS), The University Caterers Organisation (TUCO), and is a member of the Southern Universities Purchasing Consortium (SUPC).

SUPC is a member of Electronics Watch, and its Modern Slavery statement is available on its website: <https://www.supc.ac.uk/about-us/sustainability>

The University works with the Higher Education Procurement Association (HEPA) and institutions across the sector, being a member of HEPA's Responsible Procurement Group. The University is also a member of the TUCO Sustainability Group, and the HEPA Social Value Subgroup.

Due diligence processes for slavery and human trafficking

The University has currently actioned the following:

- Identified, assessed and monitored potential risk areas in its supply chains, considering specific categories and requirements that might have higher potential exposure to the requirements of the Modern Slavery Act, such as IT and electrical recycling, food supply services and construction;
- Mitigated the risk of slavery and human trafficking occurring in its supply chain;
- Ensured that equipment disposal is executed in an ethical manner;
- Updated and implemented Supplier Terms and Conditions, to include references to modern slavery, across the University;
- Annually reviewed the "compliance with the Modern Slavery Act" Risk on the University's Risk Register;
- Continually reviewing the supplier vetting programme to ensure that it is operating correctly, removing suppliers where a breach is known and monitoring any similar cases in the sector;
- Considering the wider implications of Modern Slavery and Human Trafficking, to include a review of other University activities, including investment and acceptance of gifts, as well as Procurement.

Supplier adherence to the University's values

The University has zero tolerance to modern slavery and human trafficking and will not support or deal with any business or institution knowingly involved in modern slavery practices in any part of its operations.

The Procurement team has integrated clauses into its Terms and Conditions documents, and a requirement into its potential supplier evaluation criteria, to ensure that suppliers to the University adhere to the requirements of the Modern Slavery Act and have responsible and sustainable supply chains. Suppliers that do not adhere to this will be deselected and not used by the University.

To ensure that all suppliers in the University's supply chain and contractors, subcontractors and the manufacturers of supplied goods, comply with the University's values, a supply chain compliance programme is being prepared and implemented, and the supplier vetting programme has been reviewed to ensure that it operates correctly, removing suppliers where a breach is known and monitoring any similar cases in the sector.

The Procurement team has also implemented a Supplier Code of Conduct that relates to supplier conduct and activity and specifically mentions modern slavery. This specifies that the University of Kent reserves the right to perform unannounced inspections and audits on or off the University campus or at supplier sites as necessary.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the University's supply chains and business, the University's Procurement team intends to provide training on this to members of staff. Staff members attended external training events in 2016 and 2017. Training was delivered internally in 2019 and 2020.

Further steps

The University will take the following further steps to combat slavery and human trafficking:

- Ensure that the practices of recruitment agencies are effectively checked before accepting workers from that agency;
- Instigate training and workshops for staff by Procurement to include the requirements around modern slavery;
- Consider including in the Induction Checklist Modern Slavery training for new starters, where appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University of Kent's slavery and human trafficking statement for the financial year ending 31 July 2024.

This statement will be reviewed and updated on an annual basis.

Signed on behalf of the University of Kent

Mark Preston
Chair of Council

Date: 26 November 2024