

## ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2019/20

### Introduction

The University of Greenwich is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes these same standards on its suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes the University of Greenwich’s modern slavery and human trafficking statement for the financial year commencing 1 August 2019 and ending 31 July 2020. It also describes planned actions in 2020/21.

This statement has been approved the University’s Governing Body, which, together with the Audit Committee, will review and update it as necessary on an annual basis.

### Structure and business of the organisation

The University is a UK based university. It was incorporated in 1970 as a company limited by guarantee and is an exempt charity for the purposes of the Charities Act 2011. The University is registered as a higher education provider with the Office for Students (OfS) and is subject to the OfS Regulatory Framework. The OfS is also the University’s principal regulator for charity law purposes on behalf of the Charity Commission for England and Wales.

The University’s Governing Body (previously known as the Court) is responsible for the setting and monitoring of the University’s strategic direction and for ensuring the effective management of the institution. Members of the Governing Body act as company directors and as charity trustees.

The objects of the University are set out in its Articles of Association and are to advance learning and knowledge in all its aspects, to enable students to develop their abilities, to contribute to the community and to develop research.

The University, including its wholly owned subsidiary companies had an annual income of £214.9m in the 2019/20 financial year. The annual accounts are available online at <https://docs.gre.ac.uk/rep/finance/report-and-financial-statements>.

The academic structure of the University is organised around four faculties, organised by academic departments / research institutes. Professional services directorates include within the Finance Office a central procurement team which provides professional purchasing support services to the University. Greenwich has devolved purchasing in its Faculties and Professional Service Departments and purchases a range of goods and services, from research equipment to consultancy services.

Further information regarding the University’s business and structure can be found on the University website at <https://www.gre.ac.uk/about-us/governance>.

## **Policies on modern slavery and human trafficking**

The University has adopted an [Anti-Slavery and Human Trafficking Policy](#), and continues to review its workplace policies and procedures to ensure that they comply with the University's commitment to act ethically and with integrity in all of its business relationships, including minimising the risk of slavery and human trafficking taking place anywhere in the University's supply chains.

### **Due diligence and compliance**

The University is a member of several purchasing consortia, including the [London Universities Procurement Consortium \(LUPC\)](#), a non-profit buying organisation. Through its [Business, Human Rights and Environment research group](#), the University is a key research partner of the LUPC, and helped to create and inform the LUPC's training on modern slavery.

LUPC has published its own Anti-Slavery and Human Trafficking Statement which sets out its position and strategy in working to prevent acts of slavery and human trafficking throughout the supply chain. As a member of the LUPC, the University is an affiliate member of [Electronics Watch](#), an independent monitoring organisation helping public sector organisations to protect the labour rights and safety of workers in global electronics supply chains. Through this affiliation, the University has access to guidance, resources and contract clauses that support responsible procurement.

Other purchasing consortia with which the University engages (APUC, SUPC and Crown Commercial Services) have also published their own Slavery and Human Trafficking Statements.

The University's standard terms and conditions of supply include standard contractual clauses which oblige all suppliers of goods and services to the University to adhere to the principles of the Act and to maintain records and evidence of their compliance. Similarly, the University's agreement templates for agreements with overseas agents and international partner colleges include provisions to ensure their practices comply with the UK Act's requirements. Prospective UK collaborative partners are required to provide their modern slavery statement (where applicable) as part of the University's partnership due diligence process. The University does not tolerate slavery and human trafficking within its supply chains.

The University also has a policy of not employing unpaid interns, and encourages companies with which it engages across the range of suppliers of goods and services to pay its interns.

The University encourages the reporting of concerns relating to Modern Slavery and provides protection to those who do so under its [Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#).

### **Further steps**

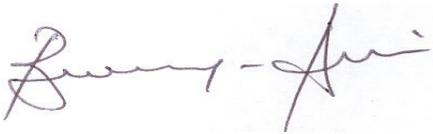
The coronavirus pandemic has had an impact on the University's planned roll-out of training for key staff with purchasing responsibilities. It is intended that this will now happen in the 2020/21 cycle. Staff whose role is in procurement will complete two modules, and those with

significant purchasing responsibility will be required to complete a test with a pass mark. All other staff will be encouraged (though not required) to complete this module, to further improve the chances that modern slavery can be identified and combated.

The University's General Counsel will also prioritise, and begin, a programme of sector-specific supply chain reviews.

Approved by the Governing Body on 24 November 2020

Signed on behalf of the University of Greenwich

A handwritten signature in dark ink, appearing to read 'Bronwyn Hill', is written over a faint, light-colored rectangular stamp or watermark.

Bronwyn Hill, Chair, Governing Body