



**University of
Nottingham**

UK | CHINA | MALAYSIA

Modern Slavery Act 2015: Annual statement 2021

Reporting period August 2020 to July 2021



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1. Introduction

The University of Nottingham, UK (‘the university’) is committed to combatting modern slavery and human trafficking. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the university’s modern slavery and human trafficking statement for the financial year ending 31 July 2021.

Organisational structure

The university has gained an outstanding international reputation for its world-class teaching and research. The university employs around 8,000 staff, across five faculties containing 27 schools and departments supported by 16 professional services departments.

The five faculties are: Arts, Engineering, Medicine and Health Sciences, Science, and Social Sciences. The university also has six research “Beacons of Excellence” that are committed to solving today’s global challenges, including the Rights Lab: the largest group of modern slavery scholars in the world, and home to the world’s leading academic experts on modern slavery.

The university is a corporation formed by Royal Charter and holds charitable status. Two main bodies are involved in the governance of the university, the Council and the Senate. At the head of the university is the Chancellor and Vice-Chancellor. The day-to-day management of the university is the responsibility of University Executive Board.

Our policy on slavery and human trafficking

The university is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The university’s Modern Slavery and Human Trafficking Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

A link to the university’s anti-slavery policy can be found at:
nottingham.ac.uk/go/modern-slavery-act-2015-policy.pdf

Our supply chains

The university purchases goods, services and works from a diverse range of suppliers, across a number of categories. It is recognised that the university's supply chains are global and complex when considering multi-tier suppliers, therefore Procurement have utilised the expertise of the Rights Lab to identify the highest risk areas within these categories of spend. This joint approach helps inform both the prioritisation and risk impact as the university continues to develop its due diligence processes. The university recognises modern slavery risks are present throughout the contracting lifecycle and is therefore embedding due diligence into its contract and supplier management programme.

The university also undertakes a significant amount of collaborative work with research partners and this area has been included as part of the university's approach when adopting due diligence processes in relation to its obligations under the Modern Slavery Act (MSA) 2015.

2. Steps taken in 2020-21

Governance

- ✓ In 2020, members of the Working Group produced a draft report about how universities are both affected by and engaging with the issue of modern slavery through analysis of existing literature and university Modern Slavery Statements. **This included an analysis of 160 UK universities and a 24-question questionnaire conducted across 26 universities, including all Russell Group members**, as well as the adaptation of an existing slavery-free city framework, created by University of Nottingham researcher Alison Gardner, into a three-part Slavery-Free Campus Framework. The Working Group used this framework and the findings from the report's research and survey to create an initial checklist of practical steps towards achieving a Slavery-Free Campus.



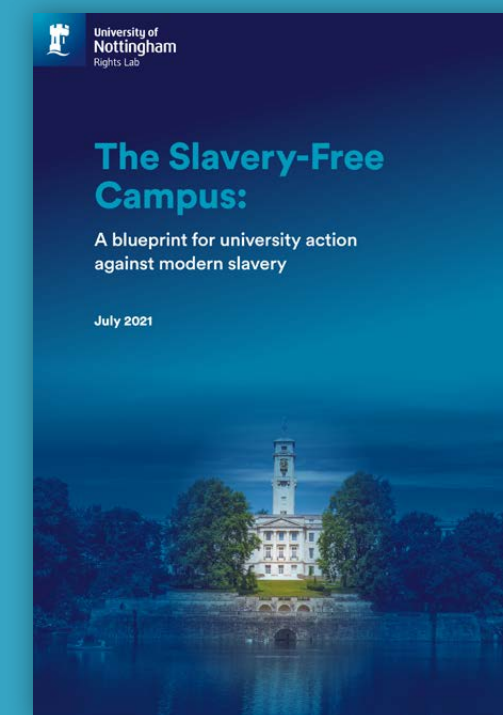
- ✓ In 2020-21, the Working Group also examined the key methodologies and benchmarking approaches available (the CHRB Core UNGP Indicator Assessment, the Modern Slavery Registry's FTSE 100 Scoring Methodology, and the KnowTheChain Benchmark Methodology), and reviewed the Marks & Spencer's Supplier Modern Slavery Toolkit. It completed this review that reached beyond the university sector because the Working Group decided to target the achievement of a leading position (over time) across sectors, rather than only within the university sector. As such, it benchmarked broadly in order to expand its existing university-centric framework to a cross-sector informed blueprint. The Working Group then combined its framework, survey findings, and the ideas from the three sector-leading methodologies and the Marks & Spencer Toolkit, to finalize a full 38-step Slavery-Free Campus Blueprint.

This Blueprint was approved by the Modern Slavery Working Group in late 2020 and endorsed by the University Executive Board in early 2021. It is now the document used by the University of Nottingham in its work towards becoming a Slavery-Free Campus. The university will report each year on progress against this Blueprint in its Modern Slavery Statement. The Working Group also has used the Blueprint to draft a multi-year

The Working Group published the 8,000-word report **The Slavery-Free Campus: A blueprint for university action against modern slavery**, and disseminated it widely, including with a launch event hosted by Baroness Lola Young, the University of Nottingham Chancellor and a key leader on the issue of modern slavery in the House of Lords, and with a dissemination plan that included policy stakeholders and university alliances.

Registered attendees at the launch event included MPs, representatives from 25 universities across the UK, the US and Australia, the Local Government Association, several city councils, the Association of Commonwealth Universities, Advance Procurement for Universities and Colleges, University Caterers Organisation, the Home Office and the Scottish Government.

Members of the Working Group also met with colleagues at Nottingham Trent University to discuss Slavery-Free Campus work, to encourage momentum on a similar blueprint-type initiative, and to plan a joint student awareness-raising event for 2021-22.



Launched in July 2021, The Slavery-Free Campus is a blueprint for adoption by all universities. See appendix 1 on page 14 for the 38-step Blueprint.

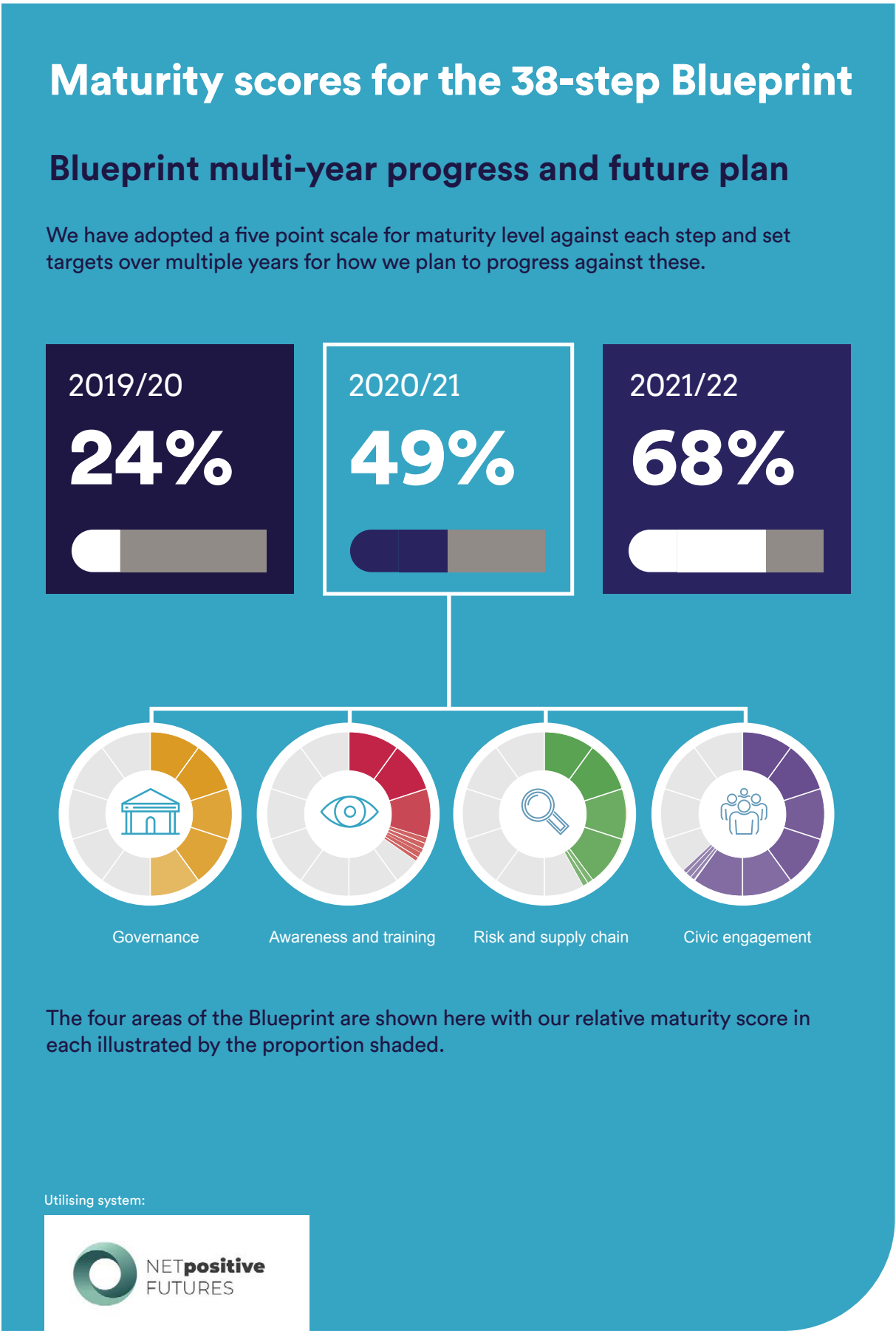
Download the document:
The Slavery-Free Campus: a blueprint for university action against modern slavery

plan for achieving excellence in each step and to develop a dashboard for progress-monitoring.

The Working Group has assigned responsibility across the Group members and university units to each step of the Slavery-Free Campus Blueprint. We have adopted a five point scale for maturity level against each step and set targets over multiple years for how we plan to progress against these. **In 2020-21 we have achieved a maturity score of 49% versus 24% in 2019-20.**

We have developed a MSA dashboard for our internal use to monitor both leading and lagging measures of progress and performance for the university's operations and supply chain (our KPI suite). **Our KPI on % suppliers on our Terms and Conditions is now consistently >85% and our # of suppliers is now c6,800, a reduction of >2,500 versus the previous year.**

Figure 1: Maturity score and MSA dashboard



Awareness and training



- ✓ Internal engagement included a presentation by Working Group members of the 38-part Blueprint to the University Executive Board; a presentation and panel discussion about modern slavery at the university's first annual Diversity Festival, including discussion of the university's own role in helping to tackle the problem, attended by 70 people; and a presentation of the Working Group's progress, vision and Blueprint to **300 colleagues who are part of the university's Finance and Infrastructure team** (Campaign and Alumni Relations, Estates and Facilities Management, Nottingham Hospitality and Nottingham Conferences, Financial Management, Financial Control, Information Services, Procurement, Research and Innovation). In July, we posted our Blueprint launch in the university campus newsletter, inviting all university staff to the launch event hosted by university Chancellor.
 - ✓ HR training on modern slavery was attended by 86 people and hosted by the university Director of HR.
- The Working Group completed a training needs assessment and plan. Starting in 2021-22, tailored training and resources will be delivered to colleagues across the university, including to those working in Procurement, Estates, HR, Campus Life, and the Students' Union.
- ✓ In the area of student training, education and engagement, the Rights Lab worked with the School of Politics and International Relations to host paid student interns for seven-week placements on the topic of modern slavery, including on projects involving further analysis of supply chain risk.
 - ✓ The Working Group formulated a comprehensive list of front-line degree programmes, assessed current content for the inclusion of education and training of modern slavery, prioritised a list of degree programmes on which to focus in 2021-22, and established key contacts in the relevant degree programmes for Nursing, Midwifery and Social Work.



Managing risk in the supply chain



- ✓ MSA has now been incorporated in due diligence on research funders and a meeting held with the Contracts and Research Ethics governance to translate a full MSA clause on international collaboration agreements.
- ✓ Our Campaign and Alumni Relations office (CARO) are also considered within scope of potential risk of modern slavery existing in their funding streams from donors. In 2020/21 the MSA working group expanded its representation to include the Director of CARO.
- ✓ The Procurement team have undertaken a further supply chain risk assessment by comparing the known high risk commodity codes to annual spend by the university on products in these categories and the number of suppliers used to supply the products and services. The results of this risk assessment can be found in Figure 2.
- ✓ The risk analysis has highlighted the following commodity areas as being high risk: Frozen Foods, Groceries, Sports, Recreational Equipment, IT Hardware, Electrical and Mechanical components, Telephony Equipment, Temporary Recruitment Agencies, Buildings, Repair and Maintenance. Upcoming tenders in these areas will be the have explicit MSA requirements embedded into the process. The risk assessment will be repeated annually to continue informing areas needing MSA embedded into the award of tenders.

An enhanced set of tender questions was included into our £28m Lab Consumables tender to set up our own framework in consultation with experts in the Rights Lab. These questions were then scored by Procurement in conjunction with the subject matter experts in the Rights Lab to ensure all suppliers awarded a place on the framework were being proactive in their efforts to identify and action any cases of modern slavery and mitigate future risk.

Specific MSA questions were also included and weighted in the award of two Estates projects, one for a student hall of residence refurbishment (£10m) and one for a framework of contractors to carry out minor works on the university campus (£18m).

- ✓ A Supplier Code of Conduct has been developed that details the university’s expectations of suppliers leveraging best practice from both public and private sectors. The code includes Modern Slavery along with Corporate Social Responsibility and Ethical commitments.
- ✓ The Procurement team attended training provided by NetPositives. New suppliers are now required to sign up as part of the tender process, whilst existing suppliers have been actively encouraged to sign up through several rounds of communications. A total of 1,243 suppliers are now subscribed.

Figure 2: Understanding our suppliers – a summary of the 10,417 sources of supply by category risk for 2019/20.

High risk51% of our suppliers		
Level 1 category codes	Number of Level 2 codes	Supplier count*
C – Catering supplies and services	21	360
F – Furniture, furnishings and textiles	20	126
G – Sports science and recreation	9	80
H – Janitorial and domestic supplies and services	13	113
K – Computer supplies and services	23	388
L – Laboratory/animal house supplies and services	102	2,876
M – Workshop and maintenance supplies including engineering	19	843
W – Estates and buildings	27	498
Y – Facilities operations	17	0
		5,284
Medium risk10% of our suppliers		
Level 1 category codes	Number of Level 2 codes	Supplier count*
A – Audio-visual and multimedia supplies and services	18	99
D – Medical, surgical, nursing, dentistry supplies and services	10	157
E – Agricultural/fisheries/forestry/horticultural/oceanographic supplies and services	16	227
P – Printing	11	129
Q – Telecommunications	15	250
U – Health and safety and security	14	163
		1,025
Low risk39% of our suppliers		
Level 1 category codes	Number of Level 2 codes	Supplier count*
B – Library and publications	21	188
J – Utilities	10	0
N – Museums and art	9	0
R – Professional and bought-in services including consultancy**	25	2,854
S – Stationery and office supplies	10	158
T – Travel and transport (including vehicle hire and subsistence)	20	364
V – Vehicles and fleet management (purchase, lease, contract hire)	14	77
X – Non influenceable spend	17	467
		4,108

*NB Supplier count is not the same as the unique number of suppliers used by the university
**NB Includes temporary recruitment agencies which is high risk

Civic engagement

- ✓ In consultation with the MSA Working Group and the university's Civic Engagement team, the Rights Lab continued to focus locally and regionally as well as nationally and internationally in its engagement activities tackling modern slavery. For example, **in collaboration with local government, the Rights Lab completed a review of supply chains risks for a specific local council, as a prototype that all councils could adapt.** The pilot city council responded to the analysis and recommendations by introducing new supplier requirements, more stringent requirements in tender documentation, changes to reporting, the appointment of new staff focused on modern slavery due diligence, more focused training, and a new five-year Procurement Strategy that explicitly includes modern slavery. The council's Head of Procurement explained that this review and report was "instrumental in setting the direction for this work," including by providing "the justification and confidence to feature modern slavery within the strategy." The Local Government Association (LGA) – whose membership consists of 339 English councils and the 22 Welsh councils – distributed the report at its Modern Slavery in Supply Chains Hub as a key national resource for all councils.
- ✓ The Rights Lab continued to collaborate with the Gangmasters and Labour Abuse Authority (GLAA) and other law enforcement bodies locally and nationally on tackling modern slavery. This included work **leading the Nottingham and Nottinghamshire Modern Slavery Partnership to further develop and disseminate a new inter-agency 'problem profile'**, which brings together all locally relevant data on modern slavery as a means to focus future Partnership actions and draws on the findings of previous Rights Lab work on anti-slavery resilience. The Director of Intelligence (including Modern Slavery) and Force Authorising Officer for Nottinghamshire Police credited this work in the partnership with enabling them to "think more broadly and critically and strategically about slavery and exploitation at both a local and global level."



With the GLAA, which have headquarters in Nottingham, and with the Skills and Education Group and Boston College in Lincolnshire, the Rights Lab launched a new national workers' rights qualification, providing students with the skills and knowledge to protect themselves from labour abuse. Approximately 1,000 young adults took part in the pilot project across a range of colleges and other educational establishments. Once the pilot is complete, the GLAA hopes to roll the course out in full across the UK, particularly focusing on areas where there is a high risk of labour exploitation, in sectors such as construction, hospitality, textiles and agriculture.

- ✓ During the Covid-19 pandemic, the **Rights Lab designed an 87-part research agenda on Covid-19 and modern slavery and launched six projects on this topic.** Working closely with key policy, front-line and law enforcement partners, including in Nottinghamshire, the six projects included one about urgent knowledge and data gaps on the implications of the pandemic for county lines and child criminal exploitation, in order to assist police and safeguarding authorities; another about how to mitigate the greater risk of ongoing exploitation and re-exploitation of modern slavery survivors because of the pandemic; and another about the impact of Covid-19 on Romanian workers' decisions to take a seasonal job in the UK, whether workers have the necessary tools and knowledge to report exploitation, and the lessons learnt by the agricultural industry in response to managing the workforce and business needs in a time of crisis.

- ✓ The Rights Lab continued to provide coordination support for Nottingham and Nottinghamshire Modern Slavery Partnership (NNMSP). The NNMSP Chair noted in a letter that the University of Nottingham "provision of the secretariat for the Partnership has helped to reinvigorate regular activity between partners, opening the door to further collaborative work." He explained that **the Partnership had now trained more than 1,000 frontline staff in recognising signs of modern slavery and worked to improve identification and referral for victims and survivors across the County.** He explained that the University of Nottingham, via the Rights Lab, had been "actively involved in this work from the outset," and that in particular "the aspiration of building a 'slavery-free Notts' has provided a strong focus to our strategy and campaigns, helping to build awareness of the local impacts of modern slavery, and to create stronger local institutional and policy responses to the issue." The Rights Lab continues to play an active role in training alongside local partners, including the PCC's Hidden Harm Initiative. The Rights Lab also launched a new assessment of all UK partnerships (including in Nottinghamshire), in partnership with the UK Independent Anti-Slavery Commissioner, in a report titled **Partnerships for Freedom: Improving Multi-Agency Collaboration on Modern Slavery** (October 2020).
- ✓ The university continued to play a role regionally among Midlands universities on the topic of modern slavery through its **leadership of the Midlands ARC (Antislavery Research Collaboration) that brings together 19 universities from across the Midlands** to deliver research that helps antislavery stakeholders to better tackle the issue of modern slavery. After launching in May 2020, the Midlands ARC developed four working groups, held a series of working group meetings, designed a new cross-university web resource and brochure, connected academics working on similar issues, and will hold its first public-facing events in 2021.
- ✓ The Rights Lab continued to deliver talks and presentations across the city and county, as well as for audiences nationally and internationally. In 2020-21 this included an **Anti-Slavery Day Allies Training Workshop run with the survivor-led NGO Survivor Alliance**, training and information sessions for the Women's Institute and Soroptimist International, a webinar for Small and Medium-Sized Businesses (SMEs) on risks in construction in partnership with CHAS (the Contractors Health and Safety Assessment Scheme) and the GLAA, and a webinar on Responsible Business and Modern Slavery in partnership with Chariot Office Supplies Ltd, an SME that has been actively engaged with the anti-slavery agenda.



3. Further steps 2021-22

The Working Group will continue to progress work on our Slavery-Free Campus Blueprint (targeting an increase in maturity score from 49% to 68%) and to continue to disseminate our work. In particular we will focus on the following areas.

Governance

- The Working Group will translate the Blueprint and 21/22 planned progress across the 38 steps into an annual plan to manage our activities and delivery of work throughout the year. We will also map out our planned maturity progress across future years, so we have a multi-year plan towards our vision of being a Slavery-Free Campus.
- The Procurement team will integrate the Netpositives dashboard in the KPI suite of our MSA dashboard. We will continue to monitor our supply chain risk and complexity alongside our overall progress towards a Slavery Free Campus.
- We will explore research and innovation funding streams as part of expanding the assessment of our supply chain risk. We will look to apply the supply chain risk assessment used in procurement for supply of goods, products and services to this additional area of our supply chain.
- We will map and review existing university procedures and ensure that modern slavery is referenced and staff, students, suppliers and partners understand what steps they are responsible for. This should include staff guidance, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.



Awareness and training

- We will enact the next phase of communication/engagement plan across the university. We will publish an annual Campus News update on progress against the Blueprint, following its publicised launch in July 2021.
- Our new annual plan for training will be rolled out, including resources (webinars and checklists), live training sessions, and an available modern slavery expert contact for all relevant units with whom to raise initial queries.
- The Working Group will partner with 2-3 of the identified front-line degree programmes to help enhance student education and training on modern slavery, for example in the areas of Midwifery, Nursing and Social Work.



Managing risk in the supply chain

- The university's procurement policy will be reviewed to reflect the focus and ambition on reducing modern slavery in the supply chain as part of Corporate Social Responsibility. The Procurement team will conduct a risk assessment for the 20/21 financial year to indicate further high risk categories of spend in order to identify suppliers to target for Netpositives and invite to awareness events hosted by the Rights Lab.
- The Procurement team will integrate the Code of Conduct into the standard document set for all tenders ensuring suppliers sign up to the code and be bound by it in order to



hold a university contract. The Code will also be incorporated into the review process with managed suppliers under the university's Supplier Relationship Management programme.

- The Procurement team will target upcoming tenders for goods and services in high risk categories, as indicated by the annual risk assessment, and continue to build specific MSA requirements into the tender and contract award processes.
- The Procurement team will continue to encourage suppliers to sign up to Netpositives. Suppliers will be invited to attend a series of awareness events on Modern Slavery to encourage further take up of the tool.

Civic engagement

- The Rights Lab will continue to collaborate in partnership with the GLAA and other law enforcement bodies on tackling modern slavery. This will include work on risks in specific sectors and for particular groups of people, and on improving modern slavery survivors' encounters with the UK's support systems locally and nationally.
- The Rights Lab will continue its involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership, including work to share learnings between this locality's approach and a selection of international cities including in Brazil and Mozambique.
- The Working Group will introduce the Slavery-Free Campus Blueprint via the Midlands ARC to the 19 participating Midlands-based universities, to build a regional network of campuses working to become slavery-free and sharing learnings and progress.
- Members of the Rights Lab team will continue to deliver talks and presentations across the city and county, this year to include on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.
- We will further disseminate our Slavery-Free Campus report and Blueprint widely and at a range of specific events, including at a virtual roundtable as part of the Business Partners Programme, a network of local corporates. We will engage locally with Nottingham Trent University on the Blueprint and identify options for joint work between the two universities on becoming slavery-free. We will be working with the Local Government Association to adapt the Blueprint for city councils now that the reporting requirements of the Modern Slavery Act apply to the public sector.



4. Approval and review

This Statement was approved by the University of Nottingham Council on 12 October 2021.

President and Vice Chancellor, Professor Shearer West CBE

Date: 12 October 2021.

5. Appendix 1 – 38 steps to a Slavery-Free Campus

Take action for a Slavery-Free Campus – a Blueprint: 38 practical steps for universities to tackle modern slavery

Governance and management on campus

Leadership

G1	Assign accountability for addressing modern slavery and human trafficking to a Council or Board level.
G2	Form a Working Group to tackle modern slavery that includes staff from different and appropriate functions (for example, Procurement, HR, Estates). Assign operational responsibility/group leadership to an individual with the right skills, interests and influence.
G3	Working Group to discuss and initiate wider consultation on what the university wants to achieve in the area of preventing and ending modern slavery, for example, do we want to be a leader in our peer group, be a Slavery-Free Campus or meet basic legal and industry standards? Get agreement and commitment to university goals from Council/Board.
G4	Working Group to develop a map of the university's key internal and external stakeholders, including owned/partially owned subsidiaries and key partners, to understand who the university impacts through its operations and supply chain and who can support it in its antislavery goals. It is likely that all professional service departments will need to take responsibility for steps in the university's antislavery blueprint (Estates/Facilities; Finance; Procurement; Human Resources; Governance; Research).
G5	Working Group to develop an implementation plan for how to achieve the university's goals, setting clear objectives over time with clear ownership and required resources.
G6	Working Group to develop a Modern Slavery Dashboard containing key indicators of performance for own operations and supply chain towards the university goals to manage progress. Also to consider how to track and evaluate the effectiveness of actions taken in response to human rights risks.
G7	Working Group to lead on regular short-term reviews of progress towards its goals and to inform the annual, legally-required review and update of each university's Modern Slavery Statement. This should include progress against key performance indicators and the year-on-year improvement plan across processes and systems plus future commitments. Internal audit involved to bring rigour and challenge to the programme, key risks should be added to the university Risk Register.

Policies

G8	University Governance to develop a university Ethical Framework defining the ethical standards that the University sets across all of its activities. This covers stakeholder engagement, research, business operations, donations and governance. The Modern Slavery and Human Trafficking Policy within this blueprint should reflect the ambition of the university as determined in G3.
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G9	University Finance to review approach to investment to ensure their ethical investment or responsible investment policies include modern slavery. Consider being signatories of the United Nations Principles of Responsible Investment.
G10	University research services and fundraising departments to ensure that policies on research partnerships (including industry partnerships) and donors include work to ensure the university is not sending or receiving funds to and from external organisations that do not have risk mitigation in place.
G11	University HR to ensure recruitment policies set out the requirement to be aware of modern slavery in recruiting staff, and that the university mitigates slavery risk through checks on right to work in the UK. This includes via third parties as well as direct recruitment.
G12	University Procurement policy to reflect focus and ambition on reducing modern slavery risk in the supply chain as part of corporate social responsibility (CSR) approach.
Procedures and management	
G13	University HR and Student Services to actively support the safe migration of staff and students respectively via appropriate advice and monitoring of visas.
G14	Working Group to support the university to map and review existing university procedures and ensure that modern slavery is referenced and staff, students, suppliers and partners understand what steps they are responsible for. This should include staff guidance, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.
G15	University HR to establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker's landlord's name and the worker's address.
G16	University HR to demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business. Establish regular checks of employees' and applicants' addresses for high occupancy of particular houses and act accordingly on the information. Check bank accounts to identify unrelated employees paid into one account; mobile phone numbers to identify seemingly unrelated employees who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated employees who are contactable through the same number. Act accordingly on the information for all these checks.
G17	University HR to demonstrate that complaints/grievance procedures are in place, issued to all staff and operated fairly and independently.
G18	University Registrar's Office to demonstrate that a whistleblowing procedure is in place whereby all staff can confidentially raise issues of concern to a member of the senior team without fear of retribution and there is a process for responding to complaints or reported violations.
G19	Working Group to develop channels for gathering and analysing future risk information from sources such as whistle-blower hotlines, community-facing grievance mechanisms and stakeholder engagement, including suppliers. Establish a process to disclose any issues and build improvement actions based on this data and risk assessment.

Awareness and training for staff and students	
T20	Working Group to engage internally, communicating the university's goals for tackling modern slavery and updates on progress.
T21	Working Group to have a process to make all new staff aware of modern slavery through an organised induction programme and to communicate changes in policies and procedures to staff, students, suppliers and partners.
T22	Campus leaders on education (for example, PVC/APVCs) and Student Union to consider how to integrate the topic of modern slavery into student education and work with faculties/schools to include modern slavery in the syllabi of all front-line degree programmes.
T23	Working Group to outline all relevant parties to inform an on-going awareness and training plan that should include at minimum procurement, senior management, human resources, and compliance officers. Training plan to include how to implement modern slavery policies, identify modern slavery in practice and report on incidents/concerns.
T24	University Procurement to provide regular, specific training for their staff and conduct regular reviews of their procurement practices.
T25	University HR to facilitate training of counselling staff, student tutors, hall wardens, campus security staff, 'nightline' volunteers and any other students or staff members who hold pastoral roles within the university to spot the signs that may indicate exploitation and ensure victims who come forward are given appropriate care. This training should be repeated annually.
T26	University HR to ensure staff responsible for recruitment to the university's own operations and labour providers staff are trained on modern slavery policies and risk mitigation strategies. To include instructions to report and record where work-seekers are introduced by an individual claiming to be a relative or friend but may be exerting control over the workers (for example, speaking for them or waiting while they are interviewed).
T27	Working Group to support Student Union (SU) council on developing and approving new policies that examine the SU's own supply chains, ethical guidelines for suppliers, staff training and awareness-raising.
Managing risk in the supply chain	
S28	University Procurement to establish an annual risk assessment to analyse where the greatest likelihood of slavery is within the organisation's operations and its supply chain, including subcontractors. Use this, along with spend analysis (indicates where we may have most influence) to prioritise where action is focused and apply due diligence to high-risk suppliers. Disclose priority areas for action.
S29	University Procurement to develop a Supplier Code of Conduct that sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain in line with our standards. Use a Supplier Relationship Management Programme to complete an annual check that ensures all managed suppliers' MSA statements are up to date along with reporting of any known breaches either directly or within their supply chain.

S30	University Procurement to ensure the procurement process includes modern slavery in category strategies, with the particular risks of the category identified; tendering process, with specific requirements placed on the supplier when a high risk of modern slavery is present; contracts, with KPIs reflecting specific risks; supplier meetings and contract management.
S31	University Procurement to review and amend procurement practices to ensure they do not exacerbate the risk of modern slavery, develop transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights.
S32	University Procurement to ensure that all contracts for recruitment services contain the necessary complaints/grievance procedure, issued to all workers and operated fairly and independently. HR to ensure contractual obligations around MSA are monitored for all recruitment services. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers. Ensure the minimum wage is paid to all staff.
S33	University Procurement and Supplier Relationship Managers to target high-risk areas on which to focus for additional supply chain analysis, for example product areas such as lab consumables or electronics or services such as catering or construction. Explore use of supplier social audits to evaluate risk and support suppliers to mitigate risk over time.
Civic and wider engagement	
C34	Working Group to build networks and engage with organisations operating in the antislavery and labour exploitation arena and with areas such as Supply Chain risk (for example, Electronics Watch) to establish how external tools can be utilised within the university and its supply chain.
C35	Working Group to work alongside university research centres and students to ensure the organisation is participating in and supporting the work of local antislavery multisector partnerships and local prevention programmes. This could include event hosting, support for training materials or website development, and support for front-line professionals in training, and monitoring and evaluation services.
C36	Working Group to help the university develop a partnership approach to modern slavery in the local area with other local universities, to share best practice and work towards to goal of creating Slavery-Free Cities.
C37	Working Group to support a university commitment to involving modern slavery survivor input and leadership in Slavery-Free Campus efforts, recognizing the value of the expertise of those with lived experience.
C38	University campus life office to support and encourage student antislavery activities, including by student groups and unions, and where possible, invest in student-led programmes, an example being the campus-wide reading programme UoN (University of Nottingham) Against Slavery (2018-19).



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