



**University of
Nottingham**
UK | CHINA | MALAYSIA

Modern Slavery Act 2015: Annual statement 2023

Reporting period August 2022 to July 2023



Contents

1. Introduction	3
Organisational structure	3
Our policy on slavery and human trafficking	3
Our supply chains	4
2. Steps taken in 2022-23	4
Governance	6
Awareness and training	8
Managing risk in the supply chain	10
Civic engagement	11
3. Further steps 2023-24	12
Governance	12
Awareness and training	13
Managing risk in the supply chain	13
Civic engagement	14
4. Approval and review	14
5. Appendix 1 – 38 steps to a Slavery-Free Campus	15

Employs around 8,000 staff (UK)	Five faculties containing 27 schools and departments	Supported by 16 professional services departments
--	---	--

Total income £801m (2021–22)	Operating expenses £292m (Spend outside of pay 2021-22)
---	--

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 2023.

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 Vice-Chancellor and President. 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: nott.ac/modern-slavery-act

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 2022-23

In 2020 the university implemented an internationally pioneering, 38-step Blueprint to achieving a slavery-free campus. Commissioned by the university’s Modern Slavery Act Working Group, and based on ongoing research led by the university’s world-leading Rights Lab, the Blueprint acts as a guide for all universities to take action towards becoming slavery free.

Our ambitious transformational social value initiative was the first of its kind globally and remains closely aligned with the principles of the Modern Slavery Act 2015. Our approach was launched publicly in July 2021 by the university’s Chancellor, Baroness Lola Young and continues to enjoy strong University Executive Board sponsorship and Council endorsement.

The Blueprint covers four areas; governance, awareness/training, managing risk in the supply chain and civic engagement. An active, internal Working Group ensures that commitments are regularly updated, monitored and reported. The Working Group includes senior representatives from all key university functions including: procurement, finance, commercial activities, donations, registrars, student and campus life, HR as well as relevant teaching and research. Student Union representatives are also part of the Group.

The university is proud to be an active, global leader in helping deliver the vision of a slavery-free campus whilst also informing the approach taken by other public sector organisations and companies by leveraging our in-house expertise. At the University of Nottingham we solve hard problems and improve lives.

Since publishing its seminal ‘The Slavery-Free Campus’ report in 2021, the University of Nottingham’s Blueprint for how to systematically work towards a slavery-free campus has been disseminated globally and continues to support a variety of organisations across the Higher Education, Public and Commercial sectors to start their journey to be slavery free.


Download the document here:
 [The Slavery-Free Campus: a Blueprint for university action against modern slavery](#) and see appendix 1 on page 15 for the full list of actions.

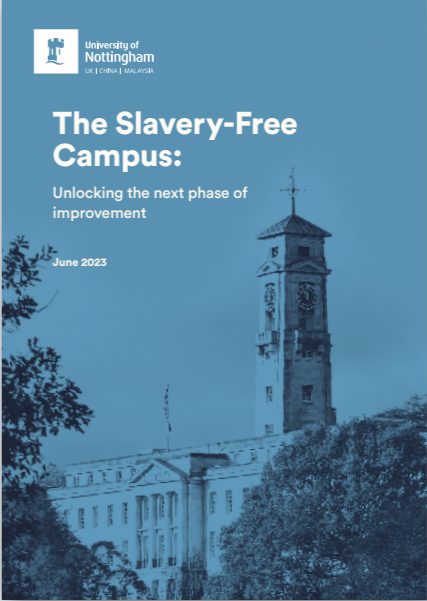
Figure 1: Comprehensive review of MSA work to date

Comprehensive review of MSA work to date

During financial year 2022-23 the Working Group commissioned a research project (completed by university PhD students with supervision from Working Group members) to assess the historical activities and progress of the University’s Modern Slavery Working Group to date, benchmark against other, leading Higher Education organisations in this space and identify future opportunities and recommendations that could unlock the next phase of improvement and continue our journey to become slavery-free.

Project activities:

- Individual interviews with 15 Working Group members and subsequent thematic analysis (to identify any overall themes, key insights, and specific recommendations)
- Identification of global Higher Education institutions, who are also actively working to address the MSA agenda, and an analysis of any points of difference
- Assessment of current Working Group effectiveness (composition, workload)



Project outputs:

- Examples of best practice at other 47 Higher Education institutions
- Validation of Blueprint progress and impact to date
- Ideas for further development generated from within the Working Group
- A set of recommendations for review by the Working Group to ensure University of Nottingham MSA activities remain world leading

Key findings and recommendations:

- The University of Nottingham’s slavery-free campus work is still world leading and collective progress to date has been measurably significant
- Other universities and organisations around the world are also now at a similar stage of development, innovation, impact and a number of their insights and innovations could be worth implementing at UoN
- Working Group membership should be assessed and, if necessary refreshed; workload and actions should be delivered more equitably across all Working Group members
- Conscious effort is now required to embed the MSA agenda across the organisation as Business As Usual with both staff, students and relevant external partners
- Working Group’s activities, progress and plans need to be communicated more effectively both within the university and externally
- The original, world-first, Blueprint needs updating and – in some areas – simplifying to enable on-going engagement and application

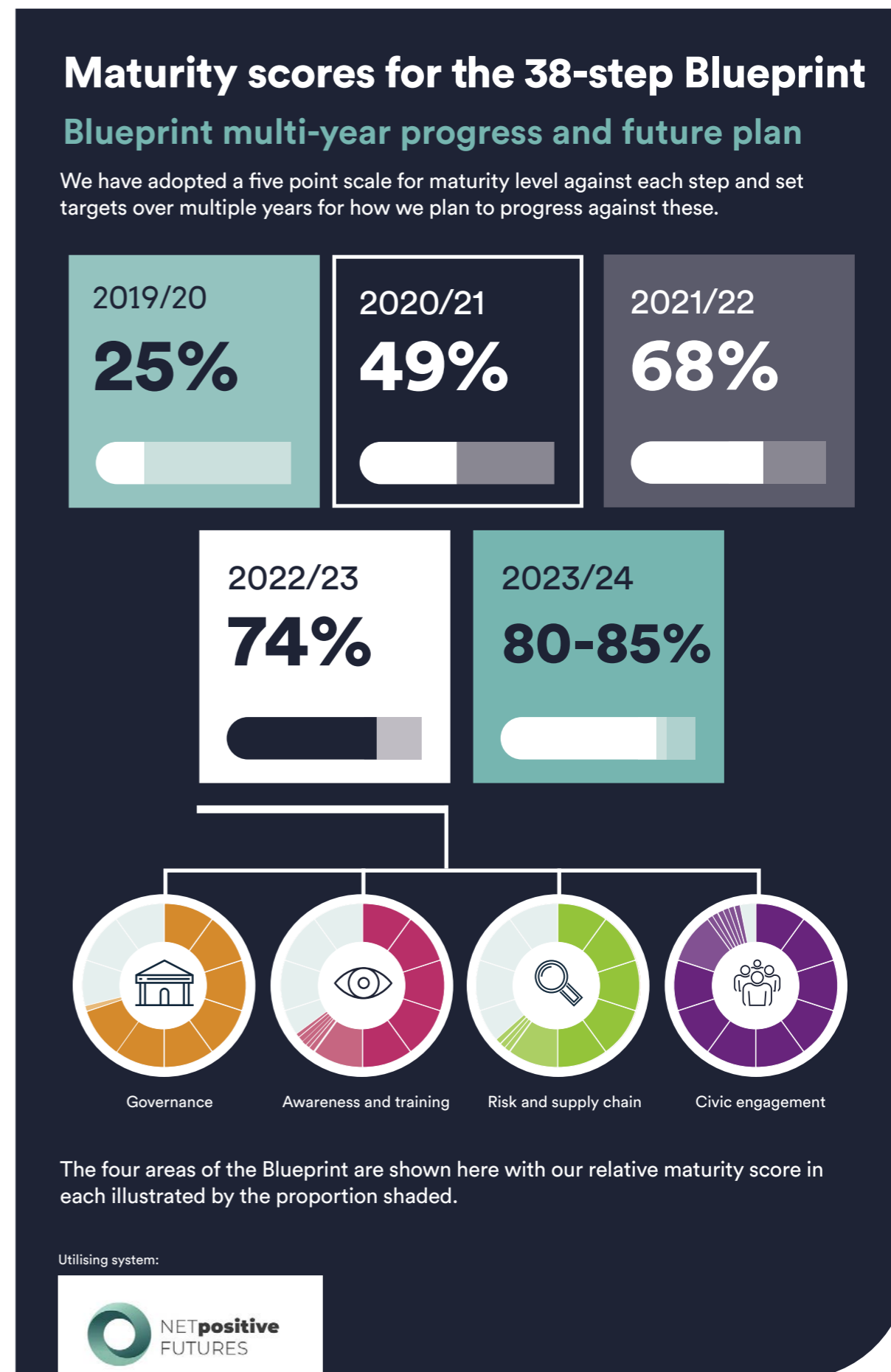
Governance



We have continued to evolve our approach to governance around modern slavery work at the University to become a slavery-free campus based on our 38-step blueprint and have expanded the membership of the Working Group responsible for delivering this. We continue to have overt sponsorship from our University Executive Board and our Chancellor for this work. This year we achieved the following:

- ✓ Continued to review the membership of our Working Group and have extended this to include greater representation from the SU (to enable engagement with our students), the Curriculum transformation team (to embed modern slavery into student education) and the Critical Incident and Safeguarding team (to focus on risk mitigation for our students).
- ✓ **Introduced the next generation of our modern slavery dashboard.** This now includes measures against number of suppliers signed up to NetPositives, supplier rationalisation statistics for UK and International suppliers, the number of contracts awarded on UoN Terms and Conditions and the risk profile for the tenders undertaken in year.
- ✓ In 2022-23 we:
 - i) had no incidents of modern slavery identified through our multiple reporting channels
 - ii) saw an increase in our UK supplier base of 10% to 10,073 and 8% in our International supplier base to 2,004
 - iii) awarded 150 contracts on UoN Terms and Conditions or equivalent that included modern slavery clauses
 - iv) used the Risk Tool on 125 awarded tenders, identified 22 as high risk that incorporated modern slavery into the evaluation and award
 - v) signed up 138 new suppliers to NetPositives during 2022-23 for a total of 1,322 current suppliers
- ✓ Continued to apply our governance approach to deliver against our Slavery-Free Campus Blueprint, meeting every quarter to review progress and agree priorities for the next period.
- ✓ Commissioned a comprehensive review and benchmarking report, managed by our Rights Lab and delivered by two of our Lab's PhD students. This internal effectiveness review captured all evidence of progress to date against our Blueprint and benchmarked across almost 50 other institutions to inform ideas to unlock the next phase of improvement and set target states against each Blueprint step.
- ✓ Reviewed our approach to responsible investment. Alongside our Investment policy which references modern slavery, we have placed our endowment fund and investment fund with Cazenove Capital who are signatories of the United Nations Principles of Responsible Investment. **The university is now ensuring that "future investments will give a significant weighting to ethical, social and governance issues and have positive impact".**
- ✓ **Introduced a Responsible Procurement policy approved by the University Finance Committee,** which sets out our approach and reflects our ambition to become slavery-free as part of the City of Nottingham's goal to become a slavery-free city. **Work is also underway with NERC UKRI, other university representatives and purchasing consortia procurement specialists to create a framework for Supplier Assurance around the areas of responsible procurement.**

Figure 2: Blueprint maturity score as part of Modern Slavery dashboard



- ✓ Following a risk alert and briefing from the GLAA around trafficking of international students to UK universities, we ran due diligence on our current student cohort, looking for examples of multiple students with the same addresses in private residences (not Halls of residence). This work confirmed that there were no observed incidences.
- ✓ Mapped our channels for gathering and analysing risk information from sources covering our student engagement dashboard, Report & Support system for safeguarding concerns, whistle-blowing process, community-facing grievance mechanisms and stakeholder engagement, including suppliers. **We have established a process to disclose any issues and build improvement actions based on this data and risk assessment.**

Awareness and training

We have continued to develop our awareness and training programme through increased engagement across the University community, by expanding our training offer to an increasing number of front-line teams and through additional professional student degree programmes. This year we achieved the following:



- ✓ **Continued to communicate internally to increase awareness and engagement with our work on the Slavery-Free Campus** and published our annual Campus News update on progress against the Blueprint and our future commitments.
- ✓ Continued to use a modern slavery awareness podbriefing as part of our standard staff induction. During the year, **our Rights Lab developed an induction and awareness training video to provide an overview of modern slavery and how to spot the signs** (including a section prepared by the GLAA referencing real case studies from the UK), introduce our Slavery-Free Campus vision and Blueprint as the approach we as a university are taking to address this issue and outline what to do if you have a concern, both on and off campus.
- ✓ In support of the goal to ensure education and training on modern slavery is part of professional/practitioner degree programmes at the University of Nottingham, staff members delivered modern slavery content to Business School students within a course on Business, Human Rights and Sustainable Development; and to Health Sciences students within the School's three degree programmes (Nursing, Midwifery, Physiotherapy and Sport Rehabilitation).
- ✓ **The School of Sociology and Social Policy's Social Work Programme delivered its Continuing Professional Development open programme for social workers** (for all levels and experience, including family support and preventative services), a series of full day courses including content on the sub-areas within modern slavery of forced marriage and child sexual exploitation.
- ✓ The Working Group has also consulted with the university's Curriculum Transformation Programme (CTP), launched in September 2022 as a university-wide initiative through which the University aims to redesign selected undergraduate and postgraduate taught degree programmes in all schools/departments, on whether modern slavery content and training can be made available through this programme. A member of the CTP team has joined the Working Group and will lead on establishing mechanisms for introducing modern slavery content via the CTP, as part of the programme's focus on the skills and values which we expect University of Nottingham graduates to be able to demonstrate.

Figure 3: Reducing the risk of student exploitation

In the last year the university has successfully completed a pilot project assessing the potential risk of modern slavery exploitation to our students. We have strengthened the training for our Safeguarding teams to increase awareness of modern slavery, as a form of risk, and what to do if there is a concern. Exploitation has been added as a specific category on our internal student Report and Support system (to enable reporting and monitoring on this issue more generally).



- ✓ All members of the procurement team have completed the Government e-learning on Key skills for tackling modern slavery in public supply chains.
- ✓ **Our Safeguarding training has been delivered regularly throughout the year** (to safeguarding leads and student-facing staff) which includes reference to modern slavery risks.
- ✓ **Awareness training has been provided to all front line staff who may be exposed to staff who are victims of modern slavery.** This training is due to be updated by HR in line with Digital Core changes which once received will form part of a cyclical training and refresher training for staff on risks to be mindful of.

Managing risk in the supply chain



The University's Procurement team lead the deployment of the Blueprint into the way goods and services are procured, using a risk-based approach working in collaboration with experts in this field from the Rights Lab. This year we have further enhanced our knowledge and capability to identify and action risk within the supply chain. This year we achieved the following:

- ✓ **Our Code of Conduct is now mandatory for all new suppliers of centrally procured contracts and highlights our focus on modern slavery.** To date has been one reported refusal by a US based company to accept our code of conduct, this was due to company policy. The supplier was providing highly skilled services so were low risk from a Modern Slavery perspective and they provided us with their own code of conduct which was acceptable.
- ✓ **The modern slavery risk tool has been applied to 155 procurements during 2022-23** resulting in identifying 21 high, 19 medium and 115 low risk tenders. Specific modern slavery questions were included in all high risk tenders with an appropriate weighted score applied to the contract award.
- ✓ **The Procurement team have done extensive analysis on the spend categories within the university** to identify where approved suppliers are required to meet the needs of stakeholders. All approved suppliers are assessed via the modern slavery risk tool. Getting the right suppliers in place is the first stage of our plan to rationalise the university's tail end of spend.
- ✓ **Electronics watch have been engaged and have made recommendations to enhance our current contractual clauses on modern slavery.** The university's standard notebook products were submitted to flag any risks in the factories producing the components.
- ✓ NetPostives has continued to be endorsed and promoted by procurement for all new tender opportunities.

Figure 4: Understanding our suppliers – a summary of the 13,513 sources of supply* by category risk for 2022-23

The university has observed a reduction of 5% in the use of high risk sources of supply.

Level 1 category codes		
High risk	50% of our suppliers	6,763 in total
Level 1 category codes		
Medium risk	12% of our suppliers	1,624 in total
Level 1 category codes		
Low risk	38% of our suppliers	5,126 in total

*Sources of supply is not the same as the unique number of suppliers used by the university.

Civic engagement



Through the work of the university's Rights Lab and the Modern Slavery Act Working Group, we continue to drive our civic agenda and support partners and other organisations to build capability and approaches to understand and mitigate risk of modern slavery. This year we achieved the following:

- ✓ With the British Standards Institution (BSI), the Rights Lab launched pioneering and revolutionary new guidance: BS 25700 Organizational Responses to Modern Slavery, the world's first national standard to help organisations within the UK and globally to eradicate modern slavery. Led by a committee chaired by the Lab, the BSI released this standard to provide organisations with practical steps to eradicate modern slavery through prevention, identification, response, remediation, mitigation, and reporting. Rights Lab members were then recognised for their exceptional contributions to standards-making with the 2022 BSI Standards Makers Award, winning the Leadership category in recognition of their role chairing the development of BS 25700.
- ✓ The Rights Lab continued its collaborations with the UK Gangmasters and Labour Abuse Authority (GLAA) and law enforcement bodies on the problem of modern slavery. **Together with the GLAA, SCAPE, the modern slavery charity Unseen and Achilles, the Rights Lab launched the Alliance against Exploitation on UK Anti-Slavery Day.** This partnership focuses on eradicate modern slavery and labour exploitation across the construction sector by sharing intelligence, identifying emerging trends and committing to robust auditing procedures.
- ✓ **The Rights Lab and Working Group supported the writing of a new national report on university action to tackle modern slavery,** produced by the Cabinet Office-hosted UK Modern Slavery Training Delivery Group.
- ✓ **The Rights Lab co-hosted and participated in an away-day event at the University campus organised by the Nottinghamshire Police and Crime Commissioner (PCC) on Modern Slavery in Nottinghamshire: latest data, responses and challenges.** Attendees were from Notts Police, the Notts Anti-Slavery Partnership, the Nottingham City Council (NCC) Slavery and Exploitation Team (SET), and the Nottingham Slavery Exploitation Risk Assessment Conference (SERAC), among other local organisations. The university's Slavery-Free Campus Blueprint was presented at the event, alongside the city's Slavery-Free City framework.
- ✓ The Rights Lab continued to work as part of the Nottingham and Nottinghamshire Modern Slavery Partnership, whose work includes the delivery of annual awareness sessions and information and updates to front line staff and third sector organisations. **The Lab's work with the NCC included an analysis of how learning disabilities and mental health problems intersect with exploitation in Nottingham,** completed in collaboration with the NCC's Slavery Exploitation Team (SET) based in Community Protection.
- ✓ The University's Slavery-Free Campus Blueprint continues to be taken up by other universities globally, including the University of Sydney, which has worked on its strategic planning and reporting around modern slavery (in line with the Australian Modern Slavery Act), has "found the Blueprint hugely helpful".

- ✓ The Rights Lab continued to host the Midlands ARC (Anti-Slavery Research Collaboration). **The University's Slavery-Free Campus Blueprint was disseminated across this network of 19 Midlands universities** to encourage adaptation and application of its principles more widely in the HE sector.
- ✓ **The Rights Lab continued its partnership with Survivor Alliance, a global network of over 400 survivor members focused on building leadership, research and policy capacity for survivors of modern slavery.** This partnership includes a Survivor Research Advisory Group, which this year discussed the University's Slavery-Free Campus mission.
- ✓ A range of student placements were completed on the topic of modern slavery, hosted by the Rights Lab. These placements were paid placements (funded by Schools), course-credit placements, or Nottingham Advantage Award placements, and focused on research and policy engagement that deepened student skills and learning in the area of modern slavery.

3. Further steps 2023-24

The Working Group will continue to progress work guided by our Slavery-Free Campus Blueprint. In particular we will focus on the following areas.

Governance



- Continue to progress our maturity score on our Slavery-Free Campus Blueprint and aim to improve our score from this year's 74% to a level of 80-85%.
- Continue to expand our engagement with internal and external stakeholders to support our anti-slavery goals with a specific focus on key subsidiaries (for example Nottingham Venues).
- Further explore possibilities for adapting elements of the Blueprint for implementation at the university's international campuses.
- Further develop our Modern Slavery dashboard to support collaboration with our suppliers – indicating where Modern Slavery has been discussed during supplier meetings and overall level of risk and engagement.
- Continue to develop our university policies and procedures to ensure that modern slavery is referenced where this is appropriate.
- Investigate how to incorporate modern slavery requirements into the development of our new HR, Finance and Procurement system that will support our anti-slavery work.
- Enhance the use of our student engagement dashboard to flag concerns around student attendance on courses that may suggest a risk of modern slavery, linking in with our Safeguarding (Report and Support) team.
- Continue to develop internal processes (in partnership with key external organisations) to identify if there are patterns of concern in regard to the potential exploitation of international students in a modern slavery context.
- Implement the recommendations made in the recent internal effectiveness review report to enhance the effectiveness of the university's activities related to modern anti-slavery.

Awareness and training



- Continue to work with colleagues across the university to develop our staff and student training offer (including the launch of new online content) with the aspiration of this being required for all new staff and students.
- Continue to communicate internally to increase awareness and engagement with our work and publish an annual Campus News update on progress against the Blueprint.
- Continue to identify scope for supporting degree programmes to enhance student education and training on modern slavery, with a particular focus on professional degree programmes. In the coming year we plan to embed education and training via the Curriculum Transformation Programme.
- Continue to host student placements on the topic of modern slavery (in order to educate and engage across the student population beyond normal teaching activities).
- Update safeguarding procedures and training to strengthen guidance in regard to potential student exploitation and modern slavery.

Managing risk in the supply chain



- Run our annual assessment on our procurement spend to understand the distribution of risk in our supply chain and to inform where we should focus due diligence as part of our Modern Slavery Procurement risk tool.
- Continue to review our modern slavery risk profile annually across our previous year's spend and build this data into our category strategies and resulting approved suppliers.
- Our Procurement team will continue the use of the Modern Slavery risk tool for every new procurement. Improvements to the tool will reflect the revised commodity codes being used alongside the new HR, Finance and Procurement system.
- Continue to engage with our Tier 1 suppliers about modern slavery as they are onboarded onto our Supplier Relationship Management programme or as part of on-going reviews. We will outline our work on a Slavery-Free Campus, introduce our Code of Conduct and explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains that we may collaborate on.
- Use the recent updates to NetPositives to inform how we monitor supplier engagement and leverage the improved questions asked of suppliers to better reflect how modern slavery is addressed.
- The Procurement team will continue to investigate how they can make best use of the Electronics Watch relationship during IT related hardware tenders.

Civic engagement



- University staff will continue to deliver talks and presentations locally and nationally, including 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.
- Further develop the Alliance Against Exploitation (with partners including SCAPE and the GLAA) tackling exploitation risk in construction
- Respond to BS 25700, the world’s first national standard on modern slavery (developed by the BSI with the Rights Lab at the University).
- Develop the first ISO (International Organization for Standardization) standard on modern slavery (building on the University’s previous work developing BS 25700).
- Continue our involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership.
- The Rights Lab will partner with Nottingham Trent University on new local research into the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham.
- Complete an analysis of Nottingham City Council procurement for modern slavery risk (with the goal of further developing the Council’s own slavery-free blueprint and risk assessment now that the Modern Slavery Act of 2015 applies to public sector bodies). Explore opportunities to support other Councils across the country.
- Work with the GLAA and Police Regional Modern Slavery and Organised Immigration Crime Coordinator to understand and, where possible monitor, local modern slavery risks for our students (particularly international students) and to inform our awareness campaigns and due diligence approaches at the university.

4. Approval and review

This Statement was approved by the University of Nottingham Council on 10 October 2023.

President and Vice-Chancellor, Professor Shearer West CBE

Date: 10 October 2023.

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.

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, Residential Experience team, 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 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 University of Nottingham (UoN) Against Slavery (2018-19).



University of
Nottingham

UK | CHINA | MALAYSIA



msa@nottingham.ac.uk