The Slavery-Free Campus:

A blueprint for university action against modern slavery

July 2021

Acknowledgements

Contents

1. Introduction and method

Under the UK Modern Slavery Act (MSA) of 2015, organisations that supply goods or services with an annual turnover of £36 million must prepare a slavery and human trafficking statement for each financial year. This includes universities.

In this report we offer a blueprint for how universities can move beyond minimum compliance with these reporting requirements, to lead in making a distinct and important contribution towards the achievement of UN Sustainable Development Goal (SDG) 8.7 (ending modern slavery).

In 2015, 193 countries agreed to SDG 8.7, but according to the International Labour Organisation and Walk Free (Global Estimates, 2017), there are still an estimated 40.3 million enslaved people in the world today, including thousands in the UK. We use the term "modern slavery" to refer to the "status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised" (Bellagio-Harvard Guidelines, 2012). This term can include servitude, forced and compulsory labour, forced marriage, and forced commercial sexual exploitation, among other forms of extreme human exploitation.

Research for this report was conducted in three phases:

Phase one

A draft report investigated how universities are both affected by and engaging with the issue of modern slavery through analysis of existing literature and university Modern Slavery Statements. We analysed 160 UK universities, and found that 74% had produced a Modern Slavery Statement, but only 34 were up to date. This analysis was used to design a Slavery-Free Campus Framework with recommendations for initial steps that universities can take in the short- and long-term to become slavery-free.

Phase two

Phase one findings were explored, tested, and developed. Data was collected by members of the Marshall Scholar Classes of 2018 and 2019 across the UK, who investigated where UK universities currently sit against the draft Slavery-Free Campus Framework. A 24-question questionnaire was conducted for 26 universities, including all Russell Group members. Statistics reported throughout to this report refer to our findings from phase two (n = 26).

Phase three

The draft Slavery-Free Campus Framework and the findings from phases one and two were shared with the University of Nottingham Modern Slavery Working Group, a committee charged with monitoring and reporting on the University's actions to reduce the risk of modern slavery. The Working Group considered the framework alongside three sector-leading business risk assessment tools and created a 38-step Blueprint of practical steps towards achieving a Slavery-Free Campus. It then used the Blueprint to create a KPI dashboard and a multi-year plan for increasing excellence against each step.

As the report illustrates, universities' engagement with the issue of modern slavery remains sporadic and piecemeal. This apparent lack of focus and effort around modern slavery on the part of universities may be due to several factors. In some cases, universities may be working quietly and simply not communicating about their efforts. Some universities may see themselves as part of the professional services sector, with the majority of their workforce comprised of highly specialised, professionalised and highly paid staff. The facilities management of activities such as catering, cleaning and security (carried out by lower paid, more precarious workers) may not be seen as core business-critical activities and may indeed be subcontracted. Another explanation may be that the procurement of goods from globalised supply chains may be classified as relatively small budget consumables. Their relative value to the organisation may mean they are afforded little management attention.

Still another explanation may be that the MSA's section on transparency in supply chains referred specifically to "commercial organisations." Initially, there was some debate about whether universities fell within the scope of the Act. Only in September 2020 did the government announce that, alongside commercial organisations, all public bodies with a budget of £36 million or more, including local authorities in England and Wales, will be required to regularly report on the steps they have taken to prevent modern slavery in their supply chains.

In understanding university responses, we therefore reviewed research about not only the private sector's response to the MSA, but potentially more relevant studies (for benchmarking the university response) about public bodies (Martin-Ortega, 2017; Martin-Ortega and Gorna, 2018; Martin-Ortega, Gorna and Islam, 2020), as well as existing research into universities' own MSA reporting (Martin-Ortega and Islam, 2017; Martin-Ortega and Krupinska, 2018; Rogerson et al, 2020).

The overall findings of all three research phases are presented in this final report. The report discusses universities as sites for exploitation risk and antislavery action; explores the role of universities in antislavery education and engagement; and presents the overarching Slavery-Free Campus Framework designed by the Rights Lab, then the final Slavery-Free Campus Blueprint for Universities, designed in response to the Framework by the University of Nottingham Modern Slavery Working Group.

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2. Universities as sites of exploitation risk

Universities are directly affected by modern slavery within three main areas of vulnerability: staff at risk, students at risk, and procurement. These categories are dominant, but not exhaustive, as the impact of modern slavery is diverse. For example, a University of Southampton lecturer was arrested for keeping a builder in slavery, which does not directly correspond to one of these categories (Stubley, 2018).

a. Staff at risk

University staff conducting unskilled labour can be vulnerable to modern slavery (Martin-Ortega, 2017). Across the 26 universities studied in phase two, high-risk categories for on-site staffing included construction, catering, cleaning, security, and maintenance. This reflects wider existing research that suggests construction, hospitality, and cleaning staff beyond the university sector are at risk of poor working conditions and exploitation (French, 2018; Gangmasters and Labour Abuse Authority, 2019; Garrett, 2017).

University Human Resources (HR) procedures were also identified as an area of risk where the right to work in the UK may not be accurately confirmed, the living wage may not be paid, temporary contracts may be used, and/or work may be outsourced to a third party (Martin-Ortega, 2017).

b. Students at risk

University students struggling financially can be vulnerable to modern slavery. A growing cohort of students lack financial resources within the university sphere (Lehmann, 2013). The resulting increased vulnerability to exploitation has potential to amount to modern slavery in the realms of forced sexual exploitation and county lines, in particular. Regarding forced sexual exploitation, "the growing impoverishment of the student population has gone hand in hand with a growth in the number of student sex workers" (Roberts et al., 2013 p.349). We do not wish to conflate sex work and modern slavery. However, participation in the sex industry in turn increases vulnerability to forced sexual exploitation and sex trafficking (Day, 2010; Dewey, 2008). Regarding county lines, some organised criminal networks recruit and exploit students to move drugs from rural to urban areas on account of their economic vulnerability (Fyfe, 2019; Simpson, 2019). The National Crime Agency (2018) has identified direct links between county lines and modern slavery.

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International students can be particularly vulnerable to modern slavery for three key reasons:

1. A lack of cultural awareness can increase risk for students studying abroad (Parker, 2017).
2. Student visas can be used to facilitate human trafficking. For example, there is a 'student trafficking trade' between Bangladesh and Malaysia whereby student visas are utilised to bring victims into a country before further exploitation (Yee et al., 2019). Bowman (2019) also reports a pattern of Vietnamese girls who enter the UK private school sector on student visas where they attend a low number of classes before 'disappearing' and becoming victim to modern slavery.
3. International students can become vulnerable to perpetrators offering them a job without legal proof of the right to work if they remain in the country with an expired visa after study (Polaris, 2017:37). The UK government has recently granted a two-year graduate work visa extension to international students, which may have reduced this element of vulnerability (Adams, 2019).

c. Procurement

Lastly, universities may purchase and use goods that have modern slavery in the supply chain. Our research found universities do acknowledge the risk that is inherent in complex supply chains. High-risk goods are identified by universities as: information communications technology (ICT), audio visual technology (AVT), laboratory consumables, office supplies, food, general catering supplies, and clothing (including staff and student uniforms).

This is supported by wider research. For example, tin and coltan – central to the production of ICT and AVT goods in universities – are commonly mined by people under forced labour conditions in the Democratic Republic of the Congo (Bales, 2016).

3. Universities as sites of risk mitigation

Many universities are now responding to these three main areas of risk.

a. Staff at risk

Risk mitigation in this category is varied across staff training and HR procedures. In the most part, universities have established anti-exploitation measures that could be further specified.

To first consider staff training, 88.5% of universities that we examined in phase two do deliver basic modern slavery awareness training to staff. Yet the nature of this training ranges from optional training available for all staff, to mandatory training for specific departments (including procurement, finance, and university management). Whilst it is likely that training helps to raise awareness, engagement with specifically vulnerable staff on campus is limited. Indeed, only 11.5% of universities were found to provide specific resources for members of staff that they identify as at higher risk.

We found that universities are more consistent in risk mitigation through specific HR procedures. We identified multiple examples of extensive legal right to work checks, robust visa assistance, the provision of clear information regarding statutory rights, and accredited living wage employers in phases one and two of our research. However, the lack of specificity was again evident with regards to the use of recruitment agencies. Of the universities we examined, 26.9% explicitly use recruitment agencies or outside firms to find job candidates. Yet only 19.2% actively apply scrutiny regarding modern slavery in identifying and mitigating the risk of sub-contracting to recruitment agencies. Some universities do avoid agency work, or only recruit through established and reputable agencies which have been subject to scrutiny in line with the MSA. However, most universities assess agencies using broad policies that do not specifically consider modern slavery.

Responsive measures are more established: 50% of universities had policies in place to support staff and students who may be

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found in situations of exploitation. The nature of these policies ranges from limited whistleblowing procedures for staff to raise concerns of maltreatment, to well-established policies and procedures concerning recruitment agencies and HR.

b. Students at risk

There is a limited recognition of vulnerable students. Only 7.7% of universities that we examined provided modern slavery training to students. Where this was the case, it was an optional online course. Similarly, only 7.7% provided specific training to staff with pastoral roles who may interact with vulnerable students. Universities do highlight international student recruitment as an area of high risk, and some have taken measures such as procedures for support regarding wellbeing and the banning of unpaid student internships. Scholarships for survivors of modern slavery are very limited.

c. Procurement

University engagement regarding procurement is more robust than the other two categories of risk. Many universities are successfully embedding their MSA response to supply chain risk within existing procurement policy and practice. For example, by including specific modern slavery questions in due diligence procedures with all suppliers, by introducing modern slavery clauses into all new contracts, and by delivering specific and regular modern slavery training to procurement staff.

This activity is likely due to 2015 MSA reporting requirements. Martin-Ortega (2017 p.519) identified universities as the principal public buyers who are actively reporting on efforts to prevent, identify and mitigate modern slavery in their supply chains in line with the MSA. Public procurement reporting requirements were clarified in 2020 with an announcement from the UK Government that public bodies (not only commercial organisations) with a budget of £36 million or more, including local authorities in England and Wales, will be required to regularly report on the steps they have taken to prevent modern slavery in their supply chains, in line with the MSA (UK Government, 2020).

However, the scope of this university engagement remains limited. Whilst over 90% of universities had published a statement, only a quarter were fully compliant with MSA requirements, placing university efforts far behind those of the FTSE 100 (Emberson, 2017; Rogerson et al., 2020). Our research finds that 88.5% of universities report that they conduct regular investigations into their supply chains for cases of modern slavery. Yet as per Rogerson et al. (2020) these disclosures are "persistently poor on detail, lack variation and have led to little meaningful action."

For example, although partnerships via consortiums are cited as key resources for improved slavery-free procurement, only 34.6% of universities in our study are affiliated to the Electronics Watch initiative, which focuses on ensuring that working conditions in the supply chains of ICT goods bought by public sector members across Europe are fully compliant with international labour rights.

We also found that most universities failed to fully acknowledge risk in investments and philanthropic donations, and display inconsistency regarding modern slavery risk in UK-based businesses versus international businesses. Rogerson et al. (2020) present a convincing analysis of such limitations, citing the herding effect, a broader lack of supply chain management, and insufficient attention to the issue at board level as key reasons for these failures.

4. Universities as sites of antislavery education and engagement

Beyond their risk mitigation activities, some universities are taking additional steps and using their specific educational contexts for antislavery innovations in the areas of awareness-raising, education, community engagement and research.

a. Awareness-raising

Excluding official staff and student training, most awareness-raising activity within universities is student-led. For example, some Student Unions have hosted fundraisers for antislavery NGOs, and others assist antislavery student societies. One programme, led by an undergraduate student with financial support from the university, delivered a year-long programme of events and activities across the campus and city that engaged over 20 thousand people (Watkins-Smith, 2019). The following year, 2019-20, the momentum and awareness-raising of this initiative led directly to the unanimous passage of a new Student Union Modern Slavery Policy which declares the Union is an antislavery institution, and mandates further action including an examination into supply chains, an annual awareness-raising campaign, and increased support for students who are survivors of, or vulnerable to, modern slavery.

However, most of this student antislavery work is sporadic: neither wide scale nor long-term. Some societies listed on university websites have been inactive for over a year. This is likely due to the high turnover of students: in years where engaged students are leading a society, it is very active, but when these students graduate, the society loses momentum. We found that 26.9% of universities actively encourage student antislavery groups and activities.

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b. Education

A more consistent route to campus community engagement has been via university teaching. This includes a specific Masters degree in Slavery and Liberation at one university, several undergraduate modules on the topic, and the inclusion of modern slavery on the core syllabus of several front-line degree programmes (for example, medicine).

However, existing research suggests that efforts to educate students on the topic are not yet widespread. Pointing to the limited nature of efforts to educate campus communities, Machura et al. (2018) found that their sample of university students could only identify two out of seven cases of modern slavery. This failure did not correlate with a broader failure to identify crime, and indicated a specific lack of knowledge about modern slavery. The finding also contrasts with findings about other countries. For example, Portuguese students demonstrate high levels of knowledge regarding modern slavery (Gonçalves et al., 2019).

Suggesting a role for educators beyond the handful of campus education initiatives currently available, an evaluation of a Labour Exploitation, Education and Awareness Project delivered by the Gangmasters and Labour Abuse Authority (GLAA) found that a more active engagement with modern slavery within higher education led to deeper and effective learning about the topic (Cottone and Gardner, 2019). An independent evaluation of the GLAA's year-long course, which embedded the subject of modern slavery across its range of academic and vocational courses, found that the project was successful among staff and students. For staff, awareness was raised and confidence in teaching the topic increased. For students, knowledge of modern slavery and labour exploitation rose, such that most students felt they could identify indicators of exploitation and would understand how to report concerns.

c. Community engagement

Universities are also beginning to meaningfully engage with local antislavery initiatives: 38.5% of universities were actively involved with such community programmes. This includes partnering with NGOs to deliver training and outreach, offering office space to local antislavery NGOs, supporting local modern slavery multi-agency partnerships (which are now in place in most areas of the UK and address modern slavery in their locality) by providing a secretariat function or serving on the local committee, and hosting events with key speakers on the subject.

d. Research

University engagement on modern slavery also extends to research, including research outputs designed to be useful tools for the broader antislavery community, and the production of data to fill evidence gaps in the global pursuit of SDG 8.7. A report by the UK Independent Anti-Slavery Commissioner and the Rights Lab (2018) mapped the research landscape for modern slavery in the UK, including areas that required additional research. This activity includes active research centres within individual universities, and multi-institutional groups. UK multi-institutional groups include the Universities Against Modern Slavery Alliance.
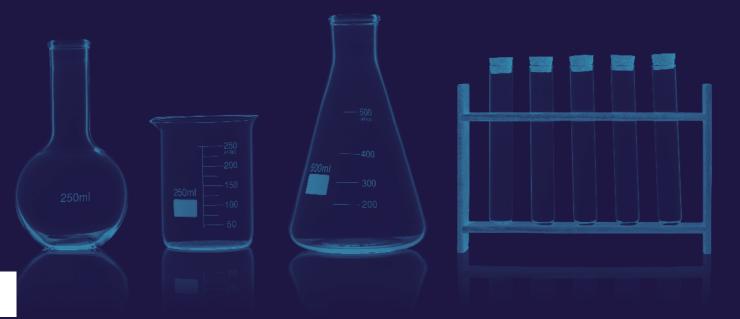
5. Design: The Slavery-Free Campus Framework

The efforts summarised in sections three and four point to the significant potential for universities to be part of antislavery efforts going forward. However, their efforts remain largely piecemeal and dependent on the interests of particular students and educators. Therefore, we now offer a structured framework for universities to consider adapting as they build more long-term, institutional responses to the problem of modern slavery.

We developed this framework for a Slavery-Free Campus around an existing "Slavery-Free Cities" framework. In 2016, the University of Nottingham worked with local partners to launch a programme of work that would uncover how to create slavery-free cities and communities, resulting in a city-based pledge. Gardner et al. (2020) then designed a "resilience framework," showing the social determinants of resilience to modern slavery in cities and communities. This research offered what it calls "a conceptual framework for understanding the process and outcomes of building resilience against contemporary forms of slavery within place-based communities." Our Slavery-Free Campus Framework is based on that "resilience framework," adapted here for the university context.

The Slavery-Free Campus Framework moves from prevention and discovery to sustainable resilience. It includes multiple immediate/short-term recommendations for each step plus a long-term recommendation for each step that is designed to encourage universities to be ambitious in their Slavery-Free Campus vision.

The Slavery-Free Campus Framework

1. Prevention: creating an environment where slavery cannot flourish

a. Short-term:

i. A programme of basic-level awareness-raising and training for all staff and students should be implemented across the university. For example, this could form part of staff induction and consist of a brief compulsory online course (for example, a pod-briefing). This serves to raise awareness of the fact that modern slavery exists, and to briefly educate on vulnerabilities. This report identifies several groups of particularly vulnerable staff and specific vulnerabilities that students themselves may face, and these groups and issues should be prioritised in awareness-raising and training materials.

ii. Universities should ensure that policies are in place to support staff and students who are found to be in situations of exploitation. This may include a robust Whistleblowing Policy where any suspected cases of modern slavery are fully investigated.

iii. Universities should avoid recruitment via agencies. Where agency recruitment is necessary, universities should use established and reputable agencies that have been subject to scrutiny in line with the MSA.

iv. Universities should actively support the safe migration of students via appropriate advice and monitoring of visas, and of staff via robust HR requirements of proof of the legal right to work in the UK.

b. Long-term:

i. Modern slavery should be included in the core syllabus of all front-line degree programmes, for example medicine, midwifery and social work. This increases community resilience to modern slavery when these students graduate and can identify and respond to cases of modern slavery in their places of work.

2. Discovery: responding to any ongoing issues within universities

a. Short-term:

i. Specific training should be provided for university 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. This ensures that victims who come forward are given appropriate care. This training should be repeated annually.

ii. University procurement departments should provide regular, specific training for staff, and conduct regular reviews of their procurement practises. This should include investigation into the supply chains of both the university and the Student Union.

iii. Procurement departments should adopt specific policies on conflict minerals and fair trade.

iv. Procurement departments should develop prioritised categories for assessment (for example, electronics, food and catering, laboratory supplies, building supplies).

v. Procurement departments should consider membership of consortiums like Electronics Watch which work to ensure good working conditions in supply chains.

vi. University finance departments should conduct regular reviews of their investment practises, to ensure their ethical investment or responsible investment policies include modern slavery, and that investments are in line with these policies. Universities should consider being signatories of the United Nations Principles of Responsible Investment, now known as PRI, and therefore integrating environmental, social and governance issues (including human rights issues such as modern slavery) into investment and ownership decisions. University fund managers should also be PRI signatories and share a commitment to assess ESG concerns in university investments.

vii. University HR departments should ensure correct recruitment procedures are being conducted by contractors and agencies and that all staff are paid the minimum wage with decent working conditions.

viii. University research services and fundraising departments should ensure that policies on research partnerships and donors include work to ensure the university is not giving funds or receiving funds from external organisations that do not have risk mitigation in place (in line with the reporting requirements of the MSA).

b. Long-term:

i. The results of regular short-term reviews of actions in 2a should inform the annual, legally-required review and update of each university's Modern Slavery Statement, which should include Key Performance Indicators and year-on-year development of long-term and robust commitments to procurement practises, HR policies, fundraising, investments, campus awareness and training.

3. Sustainable resilience: ensuring that universities maintain their commitment and engagement, evolving their response as modern slavery itself evolves

a. Short-term:

i. Universities should support and encourage antislavery activities led by student groups and unions. Where possible, universities should invest in student-led programmes.

ii. Universities should establish a specific committee or working group with responsibility to oversee work against this framework and to adapt to changing circumstances. This may be an existing working group already charged with monitoring activity against the steps laid out in the university's Modern Slavery Statement, but expanded to include additional stakeholders with responsibility for elements of The Slavery-Free Campus Framework.

iii. Universities should involve survivor input and leadership in their Slavery-Free Campus work and committee, recognising the value of the expertise of those with lived experience. The Survivor Alliance (Rights Lab, 2020) has a network of survivor leaders available for consultancy.

b. Long-term:

i. Universities should participate in and support the work of local antislavery multi-sector 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. This civic engagement also feeds into the discovery phase of the framework.

6. Implementation: The Slavery-Free Campus Blueprint

In piloting The Slavery-Free Campus Framework (section five) with the University of Nottingham's Modern Slavery Working Group in 2020, we were able to see the responses and new ideas of the various professional units within the university that make up the Working Group. The Working Group responded to the Framework by designing a Slavery-Free Campus Blueprint.

The Blueprint, or checklist, turns the Framework into a series of practical steps, suitable for use as a dashboard that monitors progress.

Crucially, it also assigns responsibility to different university units for the steps.

Several goals in the Blueprint are taken from the overarching framework written by the Rights Lab (report section 5): G2, G7, G9-14, G18, G19, T22, T24, T25, T27, S28, S32, C34, C35, C37, C38. Other goals were added by members of the University's Modern Slavery Working Group, which includes representation from Procurement, HR, Legal, Research Services, Estates, the Student Union and the Rights Lab, and is chaired by the university's Commercial Director, Dr Lisa Carroll.

To design the Blueprint, the Working Group reviewed the Rights Lab's analysis of existing literature and university Modern Slavery Statements (from phase one of the research process) and the Rights Lab's draft report on its findings from the 26-university survey (phase two of the research process). It also examined the key methodologies and bench-marking approaches available (the CHRB Core UNGP Indicator Assessment, the Business & Human Rights Resource Centre's FTSE 100 Scoring Methodology, and the KnowTheChain Benchmark Methodology), and reviewed the Marks & Spencer's Supplier Modern Slavery Toolkit.

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It completed this review that reached beyond the university sector because the Working Group had 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 the Rights Lab's university-centric framework to a cross-sector informed blueprint. Depending on what vision another university chooses as its own, it can choose to leverage the framework (university sector focused) or the Blueprint (benchmarked across sectors) accordingly.

Dr Carroll and Working Group colleagues then combined the Rights Lab's Slavery-Free Framework and survey findings with the ideas from the three sector-leading methodologies and the Marks & Spencer Toolkit, to create the full 38-step Slavery-Free Campus Blueprint.

This Blueprint was approved by the Modern Slavery Working Group in 2020 and endorsed by the University Executive Board in 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 has used the Blueprint to draft a multi-year plan for achieving excellence in each step and to develop a dashboard for progress-monitoring.

No two universities are the same, and no two plans to become a Slavery-Free Campus will look the same. Modern slavery is a dynamic problem, and so universities should consider adapting the framework and Blueprint for their specific needs and contexts. We acknowledge that most universities are unlikely to have capacity to implement this full 38-part Blueprint with immediate effect. But we recommend that each university begin by considering the Blueprint alongside their specific contexts and priorities. After working to design their own approach, each university should also conduct an annual review and reappraisal of their Slavery-Free Campus plan, in order to update it for changing circumstances and emerging issues.

The Framework and Blueprint are specific to the UK context, which has reporting requirements for universities in response to the 2015 MSA, but could be adapted for other country contexts.

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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, 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 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).

7. Conclusion

Universities are directly affected by the issue of modern slavery. They are sites of exploitation risk, and of risk mitigation and antislavery education and engagement. They have significant potential to be more fully involved in antislavery efforts locally, nationally, and internationally.

Our Slavery-Free Campus Framework suggests the principles around which universities can mobilise resources and strengths as educational communities, employers, buyers, investors, and civic partners. Our accompanying Slavery-Free Campus Blueprint provides 38 practical steps for any university to use or adapt in its annual workplan for tackling modern slavery risk.

The "Slavery-Free Campus" concept borrows very deliberately from the "Slavery-Free City" approach developed by Dr Alison Gardner (Rights Lab, University of Nottingham). In 2017, city and county leaders in Nottingham and Nottinghamshire signed a pledge to become slavery-free. That pledge has now been signed by multiple UK cities. The "Pledge to become a Slavery-Free Community" reads:

As leaders in Nottinghamshire we, the undersigned, commit to doing everything in our power to make our City and County free of modern slavery. We will work proactively with national and local government, law enforcement agencies, businesses, the voluntary and community sector, faith bodies and our local communities to:

- Demonstrate strong local leadership for antislavery initiatives
- Raise awareness amongst our staff, associates and the people we serve on a daily basis
- Train our staff to recognise and respond appropriately to potential signs of slavery
- Share intelligence and information to help detect slavery and ensure it cannot take root
- Support victims and survivors in our communities
- Remove slave-based labour from our supply chains
- Contribute to building a prosperous and slavery-free local economy

In this way Nottinghamshire stands in support of the United Nations Global Sustainable Development Goal 8.7, to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour by 2030.

Since taking the pledge, the city of Nottingham has:

- Trained more than one thousand frontline staff in public services and the voluntary sector
- Carried out numerous awareness-raising and information sessions with diverse community groups
- Undertaken targeted business engagement, for instance with hoteliers
- Developed materials for celebrating and highlighting Freedom Sunday, together with a new group to take forward joint faith action
- Created new ways to support survivors, over the long term

It has achieved this with the leadership of the Nottingham and Nottinghamshire Modern Slavery Partnership (NNMSP), which brings together a wide range of members to raise awareness about modern slavery in Nottingham and Nottinghamshire, support victims and ensure the strongest possible penalties for the perpetrators of modern slavery. Member organisations include Nottingham City Council and Nottinghamshire County Council, the University of Nottingham, local businesses, churches, charities and the Police.

Similarly, a university will need the leadership of a multi-department Modern Slavery Working Group (see Blueprint G2) to achieve its slavery-free goals. And, like the Slavery-Free City pledge, the "Slavery-Free Campus" mission commits a university to **doing everything in its power** to make its campus free of modern slavery, rather than guaranteeing a slavery-free status. In describing a vision of a "Slavery-Free Campus," we are not suggesting that it is possible to guarantee that all aspects of the university's supply chains and operations will be free of modern slavery, forever. The "Slavery-Free Campus" concept commits a university to taking action to ensure that its systems are as resilient as possible to modern slavery—that it has **taken all possible action** in its procurement, hiring, safeguarding, and training to prevent modern slavery, and has a clear process for managing instances of modern slavery if they do occur.

Last year, the UK marked the fifth anniversary of the Modern Slavery Act's Royal Assent and passage into law (26 March 2015). The Government also announced that public bodies must comply with the requirements of the MSA and published the world's first Government Modern Slavery Statement, setting out the steps taken to eradicate modern slavery from its supply chains on around £50 billion of its annual spending. It is time for all universities to move beyond minimum compliance with the reporting requirements of the MSA, and become leaders in the work of tackling and ending modern slavery—starting with their own campuses.

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