

# Modern Slavery Policy Statement

A Review of August 2022 to July 2023

## 1.0 Introduction

Royal Holloway, University of London, purchases a wide range of goods, services and works which are sourced from both national and international suppliers. The University recognises that it has a responsibility to take a robust approach in its supply chains and is committed to a zero-tolerance policy in relation to modern slavery and human trafficking.

## 2.0 Purpose of this statement

This statement sets out Royal Holloway's wide ranging policy regarding the requirements of Section 54(1) of the Modern Slavery Act 2015, for the financial year ending 31<sup>st</sup> July 2023. This is the fifth statement under this Act.

## 3.0 Identified Risks

The University procures a wide range of goods, services and works, used in its academic and research activities and for its routine business operations. These fall into the following broad categories: Scientific Consumables and Equipment, Library Resources, Professional Services, ICT Equipment and Services & Estate Works and Services.

Within these categories the following types of contracts are likely to carry the highest risks in relation to modern slavery and human trafficking: Construction, Catering Supplies, Cleaning Services, ICT Equipment and Services, Scientific Consumables & Office Supplies.

The University is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements, and contracts, with suppliers that share and adhere to this vision.

The University has adopted the collaboratively developed and reviewed by the Sustain Project, members including APUC, LUPC, HEPA, EAUC, various HE/FE institutional Procurement and Sustainability leaders, NUS (and other student associations) and People & Planet Supply Chain Code of Conduct, which is based on the Ten Principles of the UN Global Compact. The University expects all its suppliers to comply with its Supply Code of Conduct (<https://rebrand.ly/royalholloway-supplierportal>) which covers the following:

- Social compliance, for example no use of forced or under aged labour, the provision of suitable working conditions and fair treatment of workers.
- Ethical compliance and economic development, for example acting with integrity, compliance with laws and regulations, and support of fair trade.
- Environmental compliance, for example avoidance of environmental harm and taking actions to reduce environmental impact.

The University is a member of the London Universities Purchasing Consortium which considers responsible procurement throughout all of its activities and is considered a leader in this field.

The University is an affiliate member of Electronics Watch (<https://electronicswatch.org/en>), which is an independent monitoring organisation that works with public sector organisations to promote and enable responsible procurement and protect the rights of workers in electronic supply chains.

#### **4.0 Statement on the University's policy in relation to modern slavery and human trafficking**

Royal Holloway, University of London, commits to acting in an ethical manner and with integrity in its business relationships to implement processes that ensure modern slavery and human trafficking are not taking place in the University's supply chains.

The University does not wish to support or deal with any business knowingly involved in modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

The University is committed to tackling modern slavery issues as they may arise in respect of recruitment procedures, and will act in compliance with legal requirements under the Act. The University only wishes to work with employment agencies which likewise comply with the Act. We will apply selection and recruitment practices that help identify and tackle modern slavery.

The University encourages all staff, students and visitors to report any concerns relating to its direct activities and in respect of its supply chains where they believe there is or maybe a risk of non-compliance with this policy.

#### **5.0 Steps to be taken to ensure adherence to this policy**

Royal Holloway will make available this policy to all students, staff, suppliers and the public, together with plans and procedures that will impact the supply chain management in respect of modern slavery, human trafficking, forced and bonded labour and labour rights violations. The University will assess instances of non-compliance and take remedial action as appropriate.

#### **6.0 Our Plans for the Future**

Royal Holloway is implementing an action plan which will be subject to annual review.

The University will

- Continue to work with its supply base and their respective supply chains to encourage commitment to improved standards in relation to the modern slavery, human trafficking, forced and bonded labour and labour rights violations.
- Undertake due diligence on suppliers that we engage in accordance with our procurement policy.
- Sample check suppliers based on risk identification to ensure adherence to Modern Slavery Act.
- Continuing to develop an up-to-date suite of University standard contract templates to include appropriate modern slavery terms and conditions.
- Put in place measures to monitor potential risk areas in our supply chains and consider proportionate ways to mitigate the risk of slavery and human trafficking.
- Continue to provide awareness and training as appropriate to all staff who are involved in the procurement of goods and services.
- Continue to work with Electronics Watch to coordinate supplier compliance and due diligence in relation to this legislation.
- Continue to engage widely to share best practice and remain up-to-date with slavery and human trafficking within supply chains

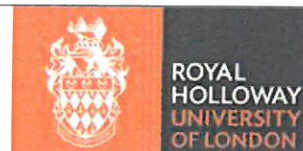
This statement will be reviewed and updated on an annual basis.

Approved By Council 23rd November 2023.

Signed:



**Professor Julie Sanders**  
**Vice-Chancellor & Principal**



**Date:** 23/11/23

## Engaging our Suppliers

All of our suppliers have been given the opportunity to complete our on-line assessment tool; this lets them tell us about the impacts (positive and negative) across the range of their business activities.

As of October 2023, 474 of our suppliers have filled this in and have told us about aspects of their operations including their approach to modern slavery. The information provided helps us to better understand our supply base and the issues that they face. The data constitutes a rich source of information that allows us to assess the level of awareness, of modern slavery and human trafficking, as well as the range of responses to it within our supply chains.

The table below provides a summary of the data generated from the assessment tool.

<b>Of these suppliers we know that:</b>	
They have a head office outside the UK	<b>110</b>
They source >25% of goods / services they provide outside of Europe	<b>96</b>
They have a dedicated lead for Corporate Social Responsibility or sustainability	<b>202</b>

<b>Our suppliers are increasingly aware of the issue:</b>	
Businesses are aware of the Modern Slavery Act	<b>474</b>
Businesses felt Modern Slavery is an issue for them	<b>104</b>

<b>Of suppliers who are aware of the Modern Slavery Act we know that:</b>	
They have a head office outside the UK	<b>110</b>
They source >25% of goods / services they provide outside of Europe	<b>167</b>
They have a dedicated lead for Corporate Social Responsibility or sustainability	<b>202</b>
They are an SME	<b>362</b>