

## Modern Slavery Act 2015

### Modern slavery and human trafficking statement - Wrexham Glyndŵr University

#### 1. Introduction

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Wrexham Glyndwr University is committed to improving its practices to combat slavery and human trafficking.
- 1.3 **This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Wrexham Glyndwr University's slavery and human trafficking statement for the financial year ending 31 July 2016.**

#### 2. Organisational structure

- 2.1 Wrexham Glyndwr University is a provider of Learning teaching and Research in the Higher Education Sector.
- 2.2 The University's origins can be traced back to 1887 when the Wrexham School of Science and Art first began delivering education and it began offering degrees from the University of London in 1892.
- 2.3 There were several name changes before, in 2008, the North East Wales Institute of Higher Education became Glyndŵr University, making it one of the youngest universities in the UK.
- 2.4 The University delivers higher education to the people of north east Wales and the cross-border area, thus playing a crucial role in the social, economic and cultural life of the region. It also attracts significant student enrolments from other parts of the UK and internationally. It works closely with local employers to ensure that they have access to a suitably skilled and qualified workforce as well as providing research and development services in specialised areas.
- 2.5 The University is widely recognised as one of the UK's leading universities for supporting students from lower socio-economic backgrounds.
- 2.6 Welsh domiciled students continue to form an important part of the University's student population. A significant number of these are Welsh speaking or wish to improve their Welsh language skills and the University reaffirms its commitment to facilitate this. WGU is working with Y Coleg Cymraeg Cenedlaethol to achieve this, which will involve the development of additional resources and supports, enhancing academic study programmes and work placements. The University is also committed to meeting its obligations under the Welsh language scheme and the proposed Welsh language Standards.
- 2.7 The vast majority of the University's students come to the University's main campus on Mold Road in Wrexham, although it also operates out of the Regent Street campus in Wrexham and sites in St Asaph, Northop and Broughton. The University also has a short-term lease on a site in Kingston-upon-Thames.

2.8 The University has a global annual turnover of £37million.

### 3. Supply chains

3.1 The University is a member of both the Higher Education Purchasing Consortium Wales (HEPCW) and the North Western Universities Purchasing Consortium (NWUPC). As a member its supply chains are channeled mainly through the consortia. NWUPC has in place its own Statement on Modern Slavery and a copy of this is attached at Annex one of this document.

3.2 HEPCW is looking to create its own compliance statement, but this is currently a work in progress. The University also on occasion procures on a smaller scale from organisations outside of the consortia and it is in the process of carrying out a supply chain mapping exercise, which in turn will inform a risk assessment analysis in respect of those supply chains outside of the consortium.

### 4. Policies on slavery and human trafficking

4.1 The University is committed (in so far as reasonably possible) to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

4.2 In light of the obligation to report on measures to ensure that all parts of its business and supply chain are slavery free the University has reviewed its workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

4.3 Those workplace policies and procedures demonstrate the University's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure (in so far as reasonably possible) slavery and human trafficking is not taking place anywhere in its supply chains.

4.4 The University operates the following policies that contribute to its approach to prevent slavery and human trafficking in its operations

**4.4.1 Whistleblowing policy.** This policy provides safeguards to enable staff to raise concerns about malpractice in connection with Wrexham Glyndŵr University. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally without fear of repercussions to the individual, even if their concerns turn out to be mistaken. Wrexham Glyndŵr University is committed to the highest standards of honesty and integrity openness and accountability and encourages its staff to raise genuine concerns about malpractice at the earliest practicable stage in the knowledge that their concerns will be taken seriously and investigated. Malpractice within the University is taken very seriously. <https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4988>

**4.4.2 Employee code of conduct.** This is enshrined in a Staff Charter the purpose of which is to make explicit the expectations of the University from its staff, and importantly, to share the University's commitments to its staff. <https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4984>

**4.4.3 Recruitment and Selection Policy.** The University is committed to attracting and retaining high performing staff who can make a valuable contribution to its on-going success. The Policy and the Procedure for the Recruitment and Selection of Staff together provide a framework for the achievement of excellence in all aspects of the University's recruitment practices. <https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4983>

**4.4.4 Procurement Policy** The procurement function of Glyndŵr University will provide professional procurement expertise to the Board of Governors, Executive and staff. It will contribute fully to the achievement of the Board's aims and objectives and will continue to raise the profile of procurement throughout the University, ensuring that the Board's business needs are met through its purchasing of goods, services and contracts and that the Welsh Government's Policy aims and objectives are core to its procurement activity. It

will also have reference to the requirements of Higher Education Funding Council for Wales (HEFCW) and the University's environmental, sustainable and ethical objectives. It will proactively manage and develop its suppliers and supply base, identifying and managing any supply risks. <https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4981>

**4.4.5 Anti- Bribery Policy.** The University is committed to ensuring that high standards of integrity apply in all of its areas of operation and that all of its business is conducted in an honest and transparent manner. As an educational establishment and a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the University is concerned to protect itself and its funders, donors, employees and students from the detriment associated with bribery and other corrupt activity. It is therefore committed to preventing bribery and fraud by staff and any third party performing services for, or on behalf of the University. The University recognises that the risk of bribery and fraud will arise in various contexts and will seek to advise, inform and/or train its employees appropriately to assess the risk of bribery and fraud being practised and implement practices which reduce the risk of it occurring or being undetected where existing processes are not already in place.

<https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4965>

**4.4.6 Treasury Management Ethical Investment Policy.** The University requires its officers to pay appropriate regard to relevant corporate governance, social, ethical and environmental considerations in the selection, retention, and realisation of all treasury investments. The Board of Governors' Strategy and Finance Committee expects this to be done in a manner which is consistent with the University's investment objectives and legal duties.

<https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4985>

**4.4.7 Value for Money Statement.** Glyndwr University recognises its responsibility to achieve value for money (VFM) from all its activities, however they may be funded. Specifically there is a duty of care to ensure that public funds are spent on the purposes for which they are intended and that good value for money is being obtained. The University is also committed to the purpose of economy, efficiency and effectiveness in its corporate and academic activities. It will seek to adopt good practice and incorporate VFM principles in all its activities.

<https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4987>

**4.4.8 Regulations on Research Practice.** Glyndwr University subscribes to the UK Research Integrity Office's Code of Practice for Research published in September 2009. The CoP applies to research organisations and to researchers, and will endeavour to meet all the obligations which the Code places on research organisations. All research conducted in or under the auspices of the University requires ethical review and approval before data collection may begin. In particular, those leading or supervising research which involves human participants (including but not limited to questionnaires, interviews, human samples and clinical research) or non-human animals must ensure approval by the University's Research Ethics Sub Committee as required by the RESC Guidance in force at the time, together with any external review and/or approval required in the field of study concerned, before beginning the research.

<https://glynfo.glyndwr.ac.uk/mod/folder/view.php?id=4983>

## 5. Due diligence processes for slavery and human trafficking

5.1 As part of its initiative to identify and mitigate risk the University is working with the North Western Universities Purchasing Consortium and associated suppliers to:

- Assess potential risk areas in its supply chains
- Mitigate the risk of slavery and human trafficking occurring in its supply chains
- Monitor potential risk areas in its supply chains
- Protect whistle blowers.

## **6. Supplier adherence to University values**


- 6.1 The University has zero tolerance to slavery and human trafficking. To ensure all those in its supply chain and contractors comply with its values it has in place a system of procuring from the two purchasing consortia, highlighted in section 3 above, whenever possible and plays an active role in working with the consortia to ensure their policies when placing contracts adhere to the insistence of compliance with the Modern Slavery Act.

## **7. Training**

- 7.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and its business, the University intends to provide training to its staff. It will also recommend that its business partners provide training to their staff and suppliers and providers.

## **8. Effectiveness in combating slavery and human trafficking**

- 8.1 Notwithstanding the areas identified in this document the University intends to develop, throughout the next financial year, a set key performance indicators (KPIs) to measure how effective it has been ensuring (as far as reasonably possible) that slavery and human trafficking is not taking place in any part of the University business or supply chains:



**Maxine Penlinton OBE**  
**Chair, Board of Governors**  
**Wrexham Glyndŵr University**

**Date: 9<sup>th</sup> December 2016**

## **ANNEX1**

### **North Western Universities Purchasing Consortium Modern Slavery Statement**

North Western Universities Purchasing Consortium (NWUPC) is a non-profit professional buying organisation owned by its Members, for its Members. NWUPC exists to generate savings and better value for our Members through the collaborative procurement of goods and services. NWUPC is committed to acquiring goods and services for its Members in the higher and further education, arts, sciences, health and cultural sectors without causing harm to others. In so doing, NWUPC is committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

NWUPC is a member of Procurement England Limited (PEL), the shared vehicle by which English HE purchasing consortia manage joint developmental and improvement projects for collaborative procurement in our sector. Together we have published our shared Sustainability Policy, to which all PEL member consortia are committed.

This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our Members, students, staff, campaigners and the public about NWUPC and its policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

Although, as a business, NWUPC turns over far less than the threshold for businesses required to publish a statement under the Act, NWUPC's Board considers that our Members' spend (around £220m annually) through its supply agreements warrants a statement on the risks inherent in our supply chains and the steps we are taking to address them, in line with NWUPC's pioneering practices in sustainable and responsible procurement. NWUPC's supply chains mainly fall under five 'super-categories', which are:

- Laboratory Consumables and Equipment
- Library Resources
- Professional Services
- ICT Equipment and Services
- Estates Goods and Services

We are working with our suppliers using an online tool provided by NetPositive Futures that asks and assists all our suppliers to develop an action plan that addresses Modern Slavery and other key sustainability issues. In this way NWUPC is taking pro-active action to ensure its contracting arrangements comply with all the relevant legislation in both of these areas.

As part of this reporting exercise in this and the coming years, NWUPC expresses its commitment to better understanding its supply chains and working towards greater transparency and responsibility towards people working on them. We will work with our suppliers in our product supply chains to encourage more of them to commit to the highest standards of business in dealing with Modern Slavery.