

University of Westminster Slavery and Human Trafficking Statement

Financial year ended 31 July 2017

Introduction

This is an update to the University of Westminster's Slavery and Human Trafficking statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015¹ and constitutes the University's slavery and human trafficking statement for the financial year ending 31 July 2017.

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.

At the University of Westminster ('the University'), we are committed to improving our practices to combat slavery and human trafficking.

Our structure

The University is an international higher education institution situated in the heart of London with more than 20,000 students in a range of subject areas based in five academic faculties. The University is incorporated under the Companies Act as a company limited by guarantee and not having share capital and is also an exempt charity. The University employs nearly 2,000 staff including teaching and research staff, visiting lecturers and support staff.

The following companies are held as investments by the University of Westminster;

Company	Nature of Business
Uniwest (Finance) Ltd	Issue of Promissory Note
Uniwest (Investments) Ltd	Dormant
Uniwest (Property) Ltd	Dormant
University of Westminster (Trading) Ltd	Research, vacation letting of halls of residence
University of Westminster (International)	About to be dissolved
WestmInnovation Ltd	Dormant
(UoW) Regent Street Cinema Ltd	Cinema

The companies are all subsidiary undertakings of the University and all operate in the UK.

The University's annual turnover is £200 million.

The University has a central procurement team that is responsible for procurement and contracting with purchasing devolved to individual faculties and departments. The University is currently a member of the LUPC consortium, which allows any department to make use of the consortium-negotiated agreements and contracts.

The University's Human Resources Management department includes the HR services, management information and systems team that provides advice to staff and ensures that HR policies and procedures, including those related to recruitment of staff, are consistently applied across the University.

Our suppliers

The University is committed to working with our partners in business and industry in ways that are mutually beneficial and socially responsible through collaboration, student placement and entrepreneurial and income generating activities. These commitments are formalised in the [Sustainability Charter](#), a joint statement between the University and its suppliers to agree to work together towards sustainability improvements, best practice and to support the University's initiatives.

The University's [Sustainable Procurement Policy & Strategy](#) represents our commitment to continuous improvement and delivery of ethical procurement practices and supply chains. The University's Supplier

¹ Government guidance is available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final_.pdf

Engagement Programme was established in 2016 with the aim of establishing shared sustainability objectives with our suppliers and work in partnership to achieve them. This takes into account the social aspects of sustainability and managing the associated risks.

In collaboration with the London Universities Purchasing Consortium (LUPC), the University is working to map out our supply chains for suppliers under existing LUPC framework agreements. This process involves targeting suppliers that represent high sustainability risks and identifying opportunities to minimise the risks and maximise sustainability.

We are a [Fairtrade University](#) that is committed to sustainable development and offering better trading conditions to, and securing the rights of, marginalised producers and workers in developing countries. The University is working closely with its suppliers to promote the use of other Fairtrade products within their supply chains and to incorporate Fairtrade requirements into our contracts. The University also provides regular updates and news about Fairtrade through the [Sustainability Blog](#) to raise awareness among staff and students.

Our policies

The University's policies, including its [Corporate Social Responsibility](#) agenda, demonstrate our commitment to acting ethically and with integrity in all our business relationships. Some of our relevant policies include:

[Ethical Code of Practice \(PDF\)](#)

[Sustainable Procurement Policy and Strategy \(PDF\)](#)

[Sustainability Charter \(PDF\)](#)

The University has in place a [Public Interest Disclosure \(Whistleblowing\) Policy](#) for formal reporting and investigation of concerns about malpractice where criminal offences, such as a breach of the Modern Slavery Act 2015, are suspected. The policy explains the routes open to all persons working or studying at or for the University, including employees, temporary workers, agency staff, people working for sub-contractors, members of the Court of Governors, and non-governor members of Court committees as well as students at the University.

The University mitigates the risk of occurrences of modern slavery in its direct employment of staff through strict adherence to its robust HR recruitment and selection policies.

Our due diligence processes

A [Sustainability Impact Analysis](#) was conducted for each of the University's high-spend supplier categories in order to determine the level of risk they presented in terms of the environmental, economic and social impacts. As a result, a set of mitigation actions were instigated in order to improve sustainability and ensure ethical practices within those supply chains.

The University also conducts due diligence processes for all suppliers who are listed as a 'Preferred Supplier'. For suppliers which are identified as high-risk, the University ensures all necessary due diligence is conducted throughout the tendering process, in respect to the Modern Slavery Act. For example, in order to be considered for an Invitation to Tender (ITT), suppliers will be required to state in the Pre-Qualification Questionnaire (PQQ) that their organisation has never been convicted of offenses relating to modern slavery.

Our progress during 2017 and our future plans

The University became an affiliate member of [Electronics Watch](#), which is an independent monitoring organisation assisting public sector buyers to meet their responsibility to protect the labour rights of workers in their global electronics supply chains. In 2017, the University collaborated with other member institutions to create effective market demand for decent working conditions in their ICT hardware supply chains, through the use of socially responsible public procurement.

In June 2017, in collaboration with LUPC and Electronics Watch, a screening of [Complicit](#) was staged at the University of Westminster's Regent Street Cinema². *Complicit* is a documentary by Heather White and Lynn Zhang which follows a group of workers in a Chinese electronics factory struck down by illness, following

² <http://blog.westminster.ac.uk/changeforgood/2017/06/complicit-film-screening-at-regent-st-cinema/>

prolonged exposure to toxic chemicals used in the manufacturing process. Following the screening there was a question and answer session with the Film's Director.

In July 2017, the University of Westminster's Head of Procurement attended a seminar by consultants for Action Sustainability presented at the LUPC's Responsible Procurement Group Meeting. The seminar detailed the new ISO 20400 Guidance Standard for Sustainable Procurement. The Guidance Standard incorporates Slavery and Human Trafficking. The University of Westminster will consider the details for achieving the ISO 20400 standard and consider whether this would be an appropriate and achievable measure going forward.

Throughout 2017, the University of Westminster had representation on the newly formed Responsible Procurement Group which is comprised of procurement professionals, sustainability managers and students drawn from the LUPC membership. As such, the University of Westminster input into the new [Responsible Procurement Policy and Strategy](#) which was prepared by the LUPC. The Strategy sets out an ambitious programme of projects and actions, a number of which are aimed at addressing risks of human rights abuses, and, as a member, the University will seek to demonstrate alignment to this policy.

As an LUPC Executive Committee member, the University of Westminster's Head of Procurement was asked to review and approve the LUPC 2017 Human Trafficking and Slavery Statement. This close engagement also helps to inform the University of Westminster statement.

Going forward, the University of Westminster will continue to closely monitor its supply chains with a view to mitigating any risk of human trafficking, slavery or any form of human rights abuse within those supply chains. The University will apply all due diligence and work in a spirit of openness and transparency with its supplier partners in order to reduced that risk.

This statement has been approved by the University Executive Board and will be reviewed and updated, as necessary, on an annual basis.

Professor Graham Megson
Acting Vice-Chancellor and President
University of Westminster
7 November 2017