

University of Westminster Slavery and Human Trafficking Statement

Financial year ended 31 July 2016

Introduction

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.

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 2016.

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	Investment in Uniwest (Finance) Ltd
Uniwest (Property) Ltd	Leasing of properties
University of Westminster (Trading) Ltd	Research, vacation letting of halls of residence
University of Westminster (International)	Education, research and training overseas
WestmlInnovation Ltd	Exploitation of intellectual property
(UoW) Regent Street Cinema Ltd	Cinema

The companies are all subsidiary undertakings of the University and, with the exception of University of Westminster (International), 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.

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

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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 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, marginalized 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 future plans

Following a review of the effectiveness of the steps we have taken in 2016 to ensure that there is no slavery or human trafficking in our supply chains the University has recently become an affiliate member of [Electronics Watch](#), an independent monitoring organisation that assists public sector buyers to meet their responsibility to protect the labour rights of workers in their global electronics supply chains. The University is intending to implement more effective systems and collaborate with other member institutions to create effective market demand for decent working conditions in their ICT hardware supply chains, socially responsible public procurement.

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

Professor Geoffrey Petts
Vice-Chancellor and President
University of Westminster

31 January 2017