

**Oxford Brookes University: Transparency in Supply chains: Anti
Modern Slavery and Human Trafficking Statement**

Version 2

**Approved by Board of Governors
2017/18**

Document Issued and Verified by the Procurement Team

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November 2017**

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1. INTRODUCTION

Oxford Brookes is one of the UK's leading modern universities and enjoys an international reputation for teaching excellence and innovation as well as strong links with business and industry.

Oxford Brookes University remains committed to supporting the UK Government's National Action Plan, updated in May 2016, to implement the UN Guiding Principles on Business and Human Rights by following and supporting the Base Code of the Ethical Trading Initiative (ETI).

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015. This statement seeks to inform:

- our staff
- students
- anybody acting on behalf of or conducting business for, Oxford Brookes University
- the public

about Oxford Brookes University and our policy with respect to modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chains. This statement includes the steps taken to identify, prevent and mitigate the risks.

This is Oxford Brookes University's second annual statement to be published under the Act.

2. ABOUT THE UNIVERSITY

The University began building its current estate in the 1950s with the establishment of the Headington Campus and now includes two other campuses at Wheatley and Harcourt Hill as well as a satellite campus in Swindon.

All campuses include libraries, 24-hour computer rooms and social spaces, as well as specialist facilities for the subjects studied there. Generally considered to be the main campus, Headington is split into three sites: Headington Road (Gypsy Lane), Headington Hill and Marston Road. The University also has multiple halls of residence, both on-campus and off-campus.

3. OUR POLICY

Oxford Brookes University has devised an Anti-Slavery and Human Trafficking Policy ([link to policy once confirmed](#)), which reflects our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains and that any acquisition of goods, services or works is without instigating harm to others.

Oxford Brookes University remains zero tolerance, to slavery and human trafficking in any part of its supply chain. Oxford Brookes University actively engages with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

The SUPC Purchasing Consortia have also published policies, to which all its members, including Oxford Brookes University, are committed. These policies aim to ensure steps are undertaken within the procurement of major contracts, for its consortia members, and that they are checked for risks within modern slavery and human trafficking.

4. SPEND CATEGORIES WHICH PRESENT RISKS OF HUMAN RIGHTS ABUSES

Oxford Brookes University's supply chains are split into 6 'super-categories', which are:

1. Audio Visual, Computing and Telecommunications
2. Estates and Facilities
3. STEMed, Laboratory Consumables and Equipment
4. Print and Office Consumables and Equipment
5. Professional Services
6. Travel and Travel Related Services

Oxford Brookes University have identified the key areas that may pose a risk of slavery and human trafficking. These include; office supplies, laboratory consumables and equipment, audio visual, computing equipment, telecommunications equipment and some estate services such as cleaning, catering and security, as well as some professional services such as uniforms, personalised clothing and promotional items.

5. DUE DILLIGENCE PROCESSESSAND THEIR EFFECTIVENESS

In our [first statement](#), we identified the main categories of goods, services and works that present a higher risk of human rights abuses. During 2016/17, Oxford Brookes University have advanced its knowledge and understanding of these risks and we are now increasingly employing strategies to address them.

5.1. Audio Visual, Computing and Telecommunications

The larger agreements and the highest proportion of spend under this category are contracted through the HE and Public sector purchasing consortia.

The purchasing consortia's have led the HE sector in the procurement of desktop and notebook personal computers. They have also played an active part in the management of supply agreements for Apple products, servers, storage and other ICT equipment.

The purchasing consortia are a founding member of Electronics Watch, enabling independent monitoring to achieve respect for labour rights in the global electronics industry through socially responsible public purchasing in Europe.

With Electronics Watch, the HE purchasing consortia are seeking to work with suppliers within this category to commit to new monitoring regimes where corporate codes of conduct and social auditing policies and practices are failing in their transparency and effectiveness, ensuring that Oxford Brookes University's contracts and agreements, as a member institution, mitigate risk.

During 2016/17, HE purchasing consortia secured the inclusion of supplier due diligence and monitoring clauses in new supply agreements for Apple products and for server and storage solutions.

5.2. Estates and Facilities

The cleaning, catering and security services were contracted internally and these contracts within Estates and Facilities are recognised as agreements where operatives are traditionally among the lower paid which Oxford Brookes University perceives to be a higher level of risk to workers in these supply chains.

Within our contracts, clauses stipulate that all operatives are to be paid at least the living wage, and the current and on-going conditions are monitored collaboratively with our suppliers. Suppliers are required to demonstrate their ongoing commitment to ensuring that they take steps, on our behalf, to guard against

modern slavery, human trafficking, forced and bonded labour and labour rights violations in their supply chains and that this is the case throughout the term of the agreement.

5.3. STEMed (Science, Technology, Engineering and Maths, education) Laboratory Consumables and Equipment

Within this category, the largest proportion of spend and contracts fall under the IRLA (Inter-regional laboratory agreement) and associated Higher Education (HE) purchasing consortia frameworks. The HE purchasing consortia have worked with the laboratory consumables suppliers to identify sources of laboratory gloves that were the subject of factory audits and media reports and are establishing whether alleged human rights abuses have yet been resolved by the suppliers and will advise Members, including Oxford Brookes University accordingly.

Most suppliers on this HE purchasing consortia framework agreement have committed to the Ethical Trading Initiative Base Code, and the HE purchasing consortia are identifying high-impact equipment lines with a view to mapping their supply chains as a prelude to developing a due diligence process in partnership with the manufacturers.

5.4. Print and Office Consumables

Print and office consumables for Oxford Brookes University are covered by the HE and Public Sector Purchasing Consortia. The issues which remain within this category are the wide range of products, many of which are sourced by distributors from producers in low-cost countries where modern forms of slavery are prevalent. Oxford Brookes University will continue to explore the issues to ensure that all products lines from at risk countries are being removed or reduced.

5.5. Professional Services

The uniforms and personalised clothing contracts, tendered internally, both ensure that the suppliers are ethical and sustainable. These tenders and contracts included the requirement for mitigation and management from modern slavery, human trafficking, forced and bonded labour and labour rights violations, by ensuring the supplier vetted their supply chains.

6. TRAINING

To ensure a high level of understanding, regarding the risks of modern slavery and human trafficking, Oxford Brookes University will continue to provide relevant training for relevant staff.

For 2017/18, Oxford Brookes University's central Procurement Team have undertaken and passed the Chartered Institute of Procurement & Supply (CIPS) on-line training module on ethical procurement and supply.

There has been significant investment into the Procurement Team, which in turn has increased the knowledge of staff across Oxford Brookes University. The Procurement Team have embedded basic training and awareness into procurement surgeries, departmental training sessions and bite sized workshops.

7. DUE DILLIGENCE DEVELOPMENT UPDATE FOR 2016/17

Oxford Brookes University has continued to express its commitment to work towards greater transparency and responsibility within and for the people working within its supply chains. This has been ensured by focusing upon tackling modern slavery to protect vulnerable workers and remedy severe human rights violations.

Oxford Brookes University has maintained and actively promoted transparency and accountability within its supply chains and all procurement processes and activities.

Due diligence systems for processes and reporting have now been evaluated to ensure improvements towards risk identification for long-term social, ethical, environmental and financial performance.

Oxford Brookes University has revisited its current standard terms and conditions to ensure clauses have been included to cover modern slavery and human trafficking as appropriate.

Oxford Brookes University encourages both whistleblowing and the use of modern slavery helplines to identify breaches of policy and contractual provisions and had made sure potential whistle blowers are protected.

Oxford Brookes University has devised a full Anti-Slavery and Human Trafficking Policy which reflects our commitment.

A Supplier Code of Conduct has also been created ensuring all major contracts and suppliers are aware and adoptive of the Oxford Brookes University vision, values and commitments.

8. DUE DILIGENCE DEVELOPMENTS FOR 2017/18

The aims and developments planned for 2017/18 include:

To ensure continued awareness raising of the implication and procedures for the Modern Slavery Act.

To implement the Net Positive tool, ensuring an increase in monitoring, reporting and due diligence within our supply chains.

To obtain the Supplier Code of Conduct returns from our high spend suppliers and major risk contracts.

This Statement has been approved and published by Oxford Brookes University and will continue to be reviewed and approved on an annual basis.