

## **Modern Slavery Act Transparency Statement**

**University of Exeter**

**Financial Year 2024/25**

### **Introduction**

At the University of Exeter (“the **University**”), we are committed to protecting and respecting human rights and do not tolerate slavery, human trafficking and other exploitation. This

- Procurement Procedures Manual. This includes guidance on social value, modern slavery & IR 35 legislation.
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Agency Workers: The University has identified there is a potential risk with agency staff for cleaning, portering and other high service roles. We seek to encourage suppliers to change their business model to enable businesses to pay their staff the Real Living Wage (RLW). The use of agency workers is quite limited and normally undertaken via existing university sector frameworks awarded after careful due diligence of suppliers. Where agencies are used on a one-off basis these tend to be UK-based and registered businesses. The main cleaning contract stipulates that the RLW is to be paid to staff, with regular checks undertaken.

Construction: Most construction is carried out by major companies, which perform much of their work through their sub-contractors. 90% of our building contractors abide by the Considerate Contractor code of conduct which includes a commitment to the well-being of the site workforce. The University also uses several procurement frameworks to source its contractors all of which use the Constructionline PAS91 pre-qualification process to vet contractors.

In terms of procurement, also see below the statements regarding Terms and Conditions and contractual arrangements.

### **Training**

The University arranged training on the Modern Slavery Act for staff, and additionally, Procurement Services' staff have also undertaken training that specifically addresses 'Protecting Human Rights in the Supply Chain' a course that looks at the issue of human trafficking/ethical procurement. This training is available to all strategic procurement staff and other senior personnel involved with operational procurement.

The strategic procurement team has undertaken training with CIPS for Modern Slavery and Social Value in 2023.

The University has updated its corporate governance training and this now includes a section that covers the Modern Slavery Act. This training is available to all staff.

Social Value has also been introduced into our procurement practices, the strategic procurement team have purchased and implemented the Social Value Portal which will monitor and report on the Social Value benefits being realised through third party spend.

### **Procurement and Contractual Due Diligence**

The University maintains its procurement templates, including the Selection Questionnaire and tendering documentation to ensure these are in line with regulatory requirements around modern slavery.

The University also works with a Higher Education procurement consortia including the Southern Universities Purchasing Consortium (SUPC) and is reassured that they are applying similar measures to their procurements and framework agreements.

The University maintains its standard terms and conditions for purchasing of goods, works and services, together with its contracts for Contractors and Consultants, to include an obligation to comply with the Modern Slavery Act and to pass this down to any supply chain.

### **Identifying Instances of Modern Slavery in Supply Chain**

The University has not identified any instance of a breach of the Modern Slavery Act in its

supply chain. Additionally, the University considers that a breach of the Modern Slavery Act would be a material breach of its contracts. In a scenario where the University identified any instance of modern slavery in its supply chain, it would seek to take action in accordance with due process. Actions would include: informing the police and terminating a contract.

Procurement at the University works to a category management approach, which gives a greater granularity of detail regarding categories of expenditure (particularly focusing on IT infrastructure, construction, cleaning and catering). This will enable the University to reduce its supplier base and have greater scrutiny of these suppliers and their supply chain.

### **Raising Concerns**

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- relationship management;
- facilitate our management of supply categories and mitigate their risks.

### **HR Statement**

The University directly employs approximately 7000 employees and we have a robust set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce.

Our Human Resources (HR) directorate and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, applicants have to provide 'right to work' information which is checked at offer stage. The majority of interviews are conducted visually in either a face to face or live video format which provides assurance that individuals have freely chosen to attend. A copy of the interviewee's right to work documentation is taken and either the originals verified by a University employee or, for visa holders (where applicable), the Home Office online checking service is used. The Home Office check is then verified virtually by means of a video call. The 'right to work' checks take place before a potential employees start date or on the morning of their first date of employment.

All employees receive a written contract of employment. HR also provide information to all new employees on their contractual rights including sick pay, holiday pay and other benefits they may be entitled to.

The University is committed to paying the Living Wage Foundation "Real Living Wage".

Salary payments will only be paid into a bank account (or joint bank account) in then5ayTente oatin5ayTente

