

OXFORD BROOKES UNIVERSITY

TRANSPARENCY IN SUPPLY CHAINS: ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT Version 7

**Approved by the Vice-Chancellor
February 2024**

CONTENTS

1. INTRODUCTION	1
2. ABOUT THE UNIVERSITY	1
3. OUR POLICY	1
4. SPEND CATEGORIES AND CONTINUAL IMPROVEMENT	2
5. TRAINING	2
6. DUE DILIGENCE DEVELOPMENT UPDATE	3
7. DUE DILIGENCE DEVELOPMENTS FOR 2023/24	4

1. INTRODUCTION

Oxford Brookes University 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.

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 seventh annual statement to be published under the Act.

2. ABOUT THE UNIVERSITY

The University spends approximately £50m - £55m per annum on Goods and Services that are necessary to keep the University running, and maintain and improve the student experience. The £50m - £55m per annum is spent with approx. 3500 suppliers, contractors and consultants, providing Brookes with the range of goods and services that are required in order to deliver on the University Strategy 2035.

Back in 2018/19 Brookes signed up to the NETpositive Supplier Engagement Tool. This enables our suppliers to develop a NETpositive sustainability action plan in line with our environmental, sustainability and institutional objectives. Suppliers are encouraged to develop a bespoke action plan that can be monitored and measured. We can then analyse the data and monitor the action plan, providing a clear and measurable focus for contract management discussions with suppliers, contractors and consultants.

3. OUR POLICY

Oxford Brookes University's [Anti-Slavery and Human Trafficking Policy](#) 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 actively engages with its purchasing consortia (SUPC, CCS and others) to support the inclusion of ethical sustainability, including addressing the abolition of slavery and human trafficking in our procurement programmes. Through this Brookes maintains its zero-tolerance policy to slavery and human trafficking in any part of its supply chain.

The SUPC Purchasing Consortia have also published policies, to which all its members, including Oxford Brookes University are committed. These policies aim to ensure that 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 AND CONTINUAL IMPROVEMENT

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. Science, Technology, Engineering and Mathematics' Education (STEMed), Laboratory Consumables and Equipment
4. Print and Office Consumables and Equipment
5. Professional Services
6. Travel and Travel Related Services

In [previous statements](#), Brookes identified the main categories of goods, services and works that present a higher risk of human-rights abuses. Since then, Oxford Brookes University continues to advance its knowledge and understanding of these risks via the Net Positive tool (see below).

Oxford Brookes University remains proactive with both whistleblowing and the use of modern slavery helplines to identify breaches of policy and contractual provisions and ensures potential whistle blowers are protected.

5. TRAINING

Brookes continues to deliver finance, procurement and contract management training to budget-holders and contract managers across the organisation. It is estimated that there are approx. 250 budget-holders, 500 further budget-responsible staff, and 100-150 contract managers.

The training that is provided incorporates contract-management best practice and includes Modern Slavery Act considerations, to ensure a high level of understanding of the risks of modern slavery and human trafficking. This training will continue to be delivered to relevant staff throughout 2024.

In addition the central Procurement Team in FLS continues to undertake the Chartered Institute of Procurement & Supply (CIPS) on-line training for its annual module on ethical procurement and supply.

Brookes will continue to work with sector colleagues to share best practice and keep up to date on identifying and assessing risks within the supply chain, including, through involvement with the SUPC and CCS purchasing consortia groups in the HE sector.

6. DUE DILIGENCE DEVELOPMENT UPDATE

The predominant targets for 20/21 were to ensure the continuation of knowledge and awareness of Modern Slavery across the University and Higher Education Sector and to explore data from the Net Positive tool. This has continued in 21/22.

Since the last statement, high-level improvements supported by the Net Positive tool, illustrates:

Continued growth in supplier adoption from 66 suppliers in 2018 to now a total of 865 in 22/23. There is a small decrease (9%) in the total number of suppliers signed-up, compared to last year (951), due to Net Positive undertaking housekeeping and deletion on their supplier list and deleting suppliers that consistently fail to complete the required Net Positive tasks that are required to maintain registration.

Our supply base on the Net Positive tool continuously identifies high level issues within their supply chains. These are grouped into Environmental, Economic and Social categories.

- Environmental issues now represent 39% of the identified high-level issues
- Economic issues now represent 40% of the identified high-level issues, and,
- Social issues now represent 39% of the identified high-level issues.

This increase however, is reflective of the disruptions that have been felt across supply chains due to global crises such as COVID-19, and the Russian:Ukraine situation, which have subsequently caused further detrimental supply chain issues such as, but not limited to, erroneous and extended shipping leading to environmental impacts; shortages of products generating economic impacts; and labour insecurity inducing social impacts.

Another example of good progress in 22/23 is that Brookes incorporated into its standards terms and conditions an anti-slavery and human trafficking clause, which states;

In performing its obligations under this Contract, the Contractor shall:

- a. comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes of the Purchaser from time to time in force including the Modern Slavery Act 2015;*
- b. not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK; and*
- c. include in its contracts with its Subcontractors and suppliers' anti-slavery and human trafficking provisions that are at least as onerous as those set out in this Clause.*

In addition, last year's aim to publish the University's Modern Slavery Statements on the Governments Modern Slavery Statement registry, has been achieved. The publication enhances transparency and fulfils the University's publication obligations.

7. DUE DILIGENCE DEVELOPMENTS FOR 2023/24

The aims and developments planned for 23/24 include:

- To continue to communicate and encourage University suppliers, who are categorised within Brookes Gold and Silver categories (i.e. high-risk and medium-risk contracts), who have not yet engaged with the Net Positive Tool, to adopt it and to develop NETpositive sustainability action plans.
- To build on the progress and success in 22/23 and continue to embed Modern Slavery considerations and increase knowledge and awareness on Modern slavery for stakeholders across the University, through continuing and enhancing the budget-holder and contract management training.
- To continue working with peers across the sector via SUPC and CCS to share best practice approaches to tackle Modern Slavery within supply chains.

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