

## Modern Slavery Act 2015

### Annual Modern Slavery Statement 2022-23 - Wrexham Glyndwr University & its Associated Subsidiaries.

#### 1. Introduction

1.1 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 to exploit them for personal or commercial gain.  
The term Modern Slavery captures a whole range of types of exploitation, many of which occur together. Someone is in slavery if they are:

- Forced to work – through mental or physical threat
- Owner or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or has restrictions placed on his / her freedom of movement

1.2 Wrexham Glyndwr University is committed to improving its practices to combat slavery and human trafficking.

1.3 **This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Wrexham Glyndwr University's slavery and human trafficking statement for the financial year ending 31 July 2021 and covers the University and all its Subsidiaries.**

#### 2. Organisational structure

2.1 Wrexham Glyndwr University is a provider of Learning teaching and Research in the Higher Education Sector.

2.2 The University's origins can be traced back to 1887 when the Wrexham School of Science and Art first began delivering education and it began offering degrees from the University of London in 1892.

2.3 There were several name changes before, in 2008, the North East Wales Institute of Higher Education became Glyndwr University, making it one of the youngest universities in the UK.

2.4 The University delivers higher education to the people of north east Wales and the cross-border area, thus playing a crucial role in the social, economic, and cultural life of the region. It also attracts significant student enrolments from other parts of the UK and internationally. It works closely with local employers to ensure that they have access to a suitably skilled and qualified workforce as well as providing research and development services in specialised areas.

2.5 The University is widely recognised as one of the UK's leading universities for supporting students from lower socio-economic backgrounds.

- 2.6 Welsh domiciled students continue to form an important part of the University's student population. A significant number of these are Welsh speaking or wish to improve their Welsh language skills and the University reaffirms its commitment to facilitate this. WGU is working with Y Coleg Cymraeg Cenedlaethol to achieve this, which will involve the development of additional resources and supports, enhancing academic study programmes and work placements. The University is also committed to meeting its obligations under the Welsh language Standards.
- 2.7 The vast majority of the University's students come to the University's main campus on Mold Road in Wrexham, although it also operates out of the Regent Street campus in Wrexham and sites in St Asaph, Northop and Broughton.
- 2.8 The University has a global annual turnover of £37million.

### **3. Supply chains**

- 3.1 The University spends circa £10 million annually with a vast number of suppliers who provide a broad range of goods, services and works. The University recognises that its supply chains spread across the world and that parts of the supply chain could be engaged in modern slavery. The University has limited resources to monitor and manage our supply chains and so will focus on its direct suppliers and will require its suppliers to ensure that their supply chains are free from modern slavery.
- 3.2 The high-risk sectors for modern slavery include agriculture, leisure, hospitality, catering, cleaning, clothing, construction, and manufacturing. A review of the University spend has shown that for most of the high risk spend areas, the University uses national or regional framework agreements and the risk of modern slavery and human trafficking by our direct suppliers is considered low.
- 3.3 The University is a member of both the Higher Education Purchasing Consortium Wales (HEPCW) and the North Western Universities Purchasing Consortium (NWUPC). As a member its supply chains are channeled mainly through the consortia. NWUPC has in place its own Statement on Modern Slavery and a copy can be accessed by clicking the following the web link:  
<https://www.nwupc.ac.uk/about/library/item/nwupc-modern-slavery-statement>
- 3.4 HEPCW are also in the process of looking at the potential risk of Modern Slavery in their supply chains. Therefore, HEPCW have developed a Modern Slavery survey that has been sent out to their framework agreement suppliers on behalf of their members.
- 3.5 The University will ensure that its direct suppliers are also aware of its commitment to tackle modern slavery and human trafficking and understand their obligations as a supplier or contractor to the University. The University has adopted a similar approach to HEPCW, and the same Modern Slavery survey has also been sent to its current suppliers.
- 3.6 The University has developed new Invitation to Tender (ITT) Template documents, which now include appropriate questions on ethical employment, modern slavery as well as on Fair working practices. Additionally, recently developed Contract Specification template now includes the requirement for suppliers to sign up to the Ethical Employment in Supply Chains code of practice (if applicable) as well as requiring suppliers to ensure workers are free to join a Trade Union.
- 3.7 The University has also engaged with ATAMIS, who is a spend analysis partner for the Welsh public sector. The use of the ATAMIS web based spend analysis tool will allow the University to identify high risk category spend areas that may be subject to unethical employment practices in their supply chains and to monitor which of its current suppliers have TISC (Transparency in Supply Chains) accreditation.
- 3.8 The University as a member of HEPCW has also recently signed up to NET Positives Supplier Engagement Tool to proactively respond to the Modern Slavery Act within our

supply chains. The Tool interprets the commitment to the eradication of Modern Slavery in broader terms than as prescribed under the Act and encourage all suppliers, irrespective of annual turnover, to make a public commitment to act against Modern Slavery. The tool allows us to understand the percentage of suppliers who acknowledge Modern Slavery is an issue for their business, to identify resultant actions to be taken by them to address Modern Slavery; and to ascertain those suppliers that do not acknowledge Modern Slavery as a consideration.

3.9 During 2021/22, 490 of the University suppliers have action plans on the Supplier Engagement Tool, which shows that:

- 98% of the suppliers state they are aware of Modern Slavery
- 74% of the suppliers state they have made a public commitment to taking action against Modern Slavery
- 27% have stated that more than 25% of the good/services they supply are sourced from outside Europe.

#### 4. Policies on slavery and human trafficking

4.1 The University is committed (in so far as reasonably possible) to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

4.2 In light of the obligation to report on measures to ensure that all parts of its business and supply chain are slavery free the University has reviewed its workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

4.3 Those workplace policies and procedures demonstrate the University's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure (in so far as reasonably possible) slavery and human trafficking is not taking place anywhere in its supply chains.

4.4 The University operates the following policies that contribute to its approach to prevent slavery and human trafficking in its operations

**4.4.1 Whistleblowing policy.** This policy provides safeguards to enable staff to raise concerns about malpractice in connection with Wrexham Glyndŵr University. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally without fear of repercussions to the individual, even if their concerns turn out to be mistaken. Wrexham Glyndŵr University is committed to the highest standards of honesty and integrity openness and accountability and encourages its staff to raise genuine concerns about malpractice at the earliest practicable stage in the knowledge that their concerns will be taken seriously and investigated. Malpractice within the University is taken very seriously.

**4.4.2 Employee code of conduct.** This is enshrined in a Staff Charter the purpose of which is to make explicit the expectations of the University from its staff, and importantly, to share the University's commitments to its staff.

**4.4.3 Recruitment and Selection Policy.** The University is committed to attracting and retaining high performing staff who can make a valuable contribution to its on-going success. The Policy and the Procedure for the Recruitment and Selection of Staff together provide a framework for the achievement of excellence in all aspects of the University's recruitment practices.

**4.4.4 Procurement Policy** The procurement function of Glyndŵr University will provide professional procurement expertise to the Board of Governors, Executive and staff. It will contribute fully to the achievement of the Board's aims and objectives and will continue to raise the profile of procurement throughout the University, ensuring that the Board's business needs are met through its purchasing of goods, services, and works and that the Welsh Government's Policy aims, and objectives are core to its procurement activity. It will also have reference to the requirements of Higher Education Funding Council for Wales (HEFCW)

and the University's environmental, sustainable, and ethical objectives. The Procurement Advisor at Glyndŵr University is a member of HEFCW's Ethical Employment in Supply Chains Working Party which has been formed to provide a forum for discussion and implementation of the Code of Practice: Ethical Employment in Supply Chains amongst the Welsh HE Sector community. The Procurement function will proactively manage and develop its suppliers and supply base, identifying and managing any supply risks.

- 4.4.5 Anti- Bribery Policy.** The University is committed to ensuring that high standards of integrity apply in all its areas of operation and that all its business is conducted in an honest and transparent manner. As an educational establishment and a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the University is concerned to protect itself and its funders, donors, employees, and students from the detriment associated with bribery and other corrupt activity. It is therefore committed to preventing bribery and fraud by staff and any third-party performing services for, or on behalf of the University. The University recognises that the risk of bribery and fraud will arise in various contexts and will seek to advise, inform and/or train its employees appropriately to assess the risk of bribery and fraud being practised and implement practices which reduce the risk of it occurring or being undetected where existing processes are not already in place.
- 4.4.6 Treasury Management Ethical Investment Policy.** The University requires its officers to pay appropriate regard to relevant corporate governance, social, ethical, and environmental considerations in the selection, retention, and realisation of all treasury investments. The Board of Governors' Strategy and Finance Committee expects this to be done in a manner which is consistent with the University's investment objectives and legal duties.
- 4.4.7 Value for Money Statement.** Glyndwr University recognizes its responsibility to achieve value for money (VFM) from all its activities, however they may be funded. Specifically, there is a duty of care to ensure that public funds are spent on the purposes for which they are intended and that good value for money is being obtained. The University is also committed to the purpose of economy, efficiency, and effectiveness in its corporate and academic activities. It will seek to adopt good practice and incorporate VFM principles in all its activities.
- 4.4.8 Regulations on Research Practice.** Glyndŵr University subscribes to the UK Research Integrity Office's Code of Practice for Research published in September 2009. The CoP applies to research organizations and to researchers and will endeavor to meet all the obligations which the Code places on research organizations. All research conducted in or under the auspices of the University requires ethical review and approval before data collection may begin. Those leading or supervising research which involves human participants (including but not limited to questionnaires, interviews, human samples, and clinical research) or non-human animals must ensure approval by the University's Research Ethics Sub Committee as required by the RESC Guidance in force at the time, together with any external review and/or approval required in the field of study concerned, before beginning the research.
- 4.4.9 Ethical Employment Policy.** Glyndŵr University has developed a draft written policy on Ethical employment, which is in compliance with commitment 1 of the Welsh Government ethical employment in supply chains code of practice. However, the finalization of the written policy is on hold to consider the Welsh Government Draft Social Partnership and Public Procurement (Wales) Bill that has is currently going through the Senedd.
- 4.4.10** Once finalized and approved the Ethical Employment policy will be included in all procurement documentation.

## **5. Training**

5.1 The University is committed to developing and delivering tailored training to our employees to raise awareness of modern slavery, human rights abuses, and blacklisting. Training will be included as part of the corporate training programme using e-learning training modules on modern slavery and ethical employment in supply chains. The Procurement function and the Human Resources Department have been working together to identify employees who are involved in buying / procurement and the recruitment and deployment of workers to deliver targeted training on modern slavery and ethical employment practices.

## **6. Implementation of Welsh Government Ethical Employment in Supply Chains: Code of Practice (COP)**

6.1 Notwithstanding the areas identified in this document the University is committed to implementing the relevant actions associated with the 12 key commitments identified in the Welsh Government's Code of Practice for Ethical Employment in Supply Chains.

### **7. During 2022-23 Financial Year we plan to:**

- Continue to engage and use the NET Positives Supplier Engagement Tool to proactively to understand the percentage of suppliers who acknowledge Modern Slavery is an issue for their business, to identify resultant actions to be taken by them to address Modern Slavery; and to ascertain those suppliers that do not acknowledge Modern Slavery as a consideration.
- Continue to monitor the employment practices of our high risk and key suppliers by sending out a follow-on modern slavery supplier survey. (Commitment 7.4 – Ethical Employment in Supply Chains Code of Practice)
- Finalise the Ethical Employment Policy in accordance with Social Partnership and Public Procurement (Wales) Bill once it has become law. (Commitment 1 & 4.1 – Ethical Employment in Supply Chains Code of Practice)
- Update and publish our Modern Slavery Statement annually to reflect progress on our actions.

**Dr Leigh Griffin**  
**Chair, Board of Governors**  
**Wrexham Glyndŵr University**

**Date: 10<sup>th</sup> November 2022**