



UNIVERSITY OF  
WINCHESTER

MODERN SLAVERY  
AND HUMAN TRAFFICKING  
STATEMENT 2025

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<p>Indicate whether the document is for public access or internal access only</p> <p>Indicate whether the document applies to collaborative provision?</p> <p><i>(Strikethrough text, as appropriate)</i></p>	<p><b>Public Access</b></p> <p><del><b>Internal Access Only</b></del></p> <p><del><b>Applies to Collaborative Provision</b></del></p>
<p><b>Summary:</b></p> <p>This statement is designed to satisfy the Requirement of Part 6 Section 54 of the Modern Slavery Act (2015) at the University of Winchester.</p>	

<b>Equality Impact Assessment</b>	
Summary of process undertaken to determine equality impacts:	Consultation with the Director of Equalities
University Committee (name/ date) where equality impacts discussed (may be Committee of approval, or another):	Board of Governors 27 November 2024
<b>Identified equality impact(s) on colleagues and students</b> (i.e. any specific impacts related to this statement that may cause disadvantage for people due to one or more particular protective characteristic)	
Protected Characteristic	Impact(s) identified and any action(s)/mitigation(s) to address these impact(s), as necessary.
Age	This statement has positive impacts and protections for all protected characteristics
Disability	This statement has positive impacts and protections for all protected characteristics
Gender Identity	This statement has positive impacts and protections for all protected characteristics
Marriage/Civil Partnership	This statement has positive impacts and protections for all protected characteristics
Pregnancy and Maternity	This statement has positive impacts and protections for all protected characteristics
Race (incl. nationality)	This statement has positive impacts and protections for all protected characteristics
Religion and Belief	This statement has positive impacts and protections for all protected characteristics
Sex	This statement has positive impacts and protections for all protected characteristics
Sexual Orientation	This statement has positive impacts and protections for all protected characteristics

# Modern Slavery and Human Trafficking Statement 2025

## Introduction

This Statement is designed to satisfy the requirements of Part 6 Section 54 of the Modern Slavery Act (2015).

The University's Financial Regulations, Procurement Policy and Procedures and Ethical Investment Policy state our commitments to the highest standards of ethical conduct in all our activities, along with making continuous improvements in this area. The University does not engage in, or condone, the practices of human trafficking, slavery or forced labour.

We are committed to improving our business practices to combat modern slavery and human trafficking and to ensure that we are not complicit in any human rights violations. We are committed to zero tolerance of slavery and human trafficking or child labour practices.

## Structure of the University

University of Winchester is a registered limited company (company number 05969256) and an exempt charity under the terms of the Charities Act 2006, and as such it is required to have charitable purposes and apply them for the public benefit. It must comply with the general law of charity. Members of the Board of Governors are charitable trustees.

The University is organised into five faculties: Education and the Arts; Humanities and Social Sciences; Business and Digital Technologies; Health and Wellbeing; and Law, Crime and Justice. We have over 800 employees and educate over 7,000 undergraduate and postgraduate students at any one time. Our annual turnover is in excess of £80 million, and whilst our key expenditure is on our academic and administrative staff, we engage with a large number of national and some international suppliers to provide us with goods and services.

## Our supply chains

The University's supply chains predominantly fall within the following categories:

- Estates and facilities management (works, services and goods)
- ICT equipment and services
- Professional services
- Teaching materials – including medical supplies

The University is a member of the Southern Universities Purchasing Consortium (SUPC) which has also published its own Modern Slavery Statement which can be found at [www.supc.ac.uk](http://www.supc.ac.uk). We channel in excess of 30% of the value of our addressable spend through SUPC and other agreements arranged by higher education and public sector purchasing consortia or frameworks. Our business and supply chains which may pose particular risks in terms of slavery are in IT and AV equipment, construction, and uniform/clothing supplies.

Our campus services are almost entirely in-sourced, and the University has made a commitment to honoring the Real Living Wage for all our employees, full time or fractional.

## **Our policies**

We are committed to making sure that there is no modern slavery or human trafficking in our supply chain or in any part of the University's business. We continue to develop our policies and procedures to reflect our commitment to acting sustainably, ethically and with integrity in all our business relationships. We are working to develop, implement and enforce effective procurement systems, processes and controls to make sure child labour, slavery and human trafficking is not taking place within our supply chains.

We expect all of our suppliers to respect and treat employees in a morally and ethically appropriate manner. Our suppliers are expected to take steps and demonstrate a commitment to making sure that their own supply chain is free from child labour, modern slavery and human trafficking. However, the University has put in place a number of measures and policies to ensure compliance with the Modern Slavery Act 2015.

We have developed Financial Regulations and Procurement Policy and Procedures that reflect our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce systems and controls to ensure our values are instilled within our purchase to pay cycle.

Our Research and Knowledge Exchange (RKE) Ethics Policy and Procedures is active and managed by the University RKE Ethics Committee. The policy describes how the University's values are embodied in the conduct of our research and knowledge exchange and makes explicit the requirement for ethical conduct by staff and students.

The University mitigates the risk of modern slavery occurring in its workforce by ensuring that directly employed staff are recruited by following robust HR recruitment policies. There is a whistleblowing policy in place for members of staff to raise any concerns about wrongdoing by the University. Staff employed on a temporary staff basis via agencies are only recruited through established sources who can provide assurance that they comply fully with the requirements of legislation relating to the rights and welfare of their candidates and employees.

Our Ethical Investment policy has been developed to reflect our commitment to ensuring that our investments are not complicit in any human rights violations, in so far as possible. To this extent the University does not knowingly invest directly or indirectly in organisations that breach human or animal rights or that are in breach of the Modern Slavery Act 2015.

## **Electronics Watch**

The University of Winchester supports the principles of Electronics Watch, an independent monitoring organisation working to achieve respect for labour rights in the global electronics industry, through socially responsible public purchasing in Europe. We subscribe to Electronics Watch (via SUPC) and include their contract monitoring clauses in all relevant agreements that we award.

In 2023/24 Electronics watch interviewed workers, led focus group discussions, delivered health and safety training, created accessible grievance channels, and identified 152 violations and 122 risks of violations in 11 countries. In 2023/24, Electronics Watch developed the Principles for Worker-Driven Remedy in consultation with trade unions, labour rights organisations, and public buyers.

## **What we accomplished in 2024**

During the year we have implemented a number of new initiatives and standard reviews to strengthen our recognition, reporting and avoidance of modern slavery and human trafficking.

We have engaged with our top 25 expenditure suppliers (covering 60% of total expenditure), to obtain assurances that they abide by the Modern Slavery Act 2015. Modern Slavery Policies have been obtained from these companies and our commitment to this policy made clear.

We have developed our training around delivering compliant tenders ensuring key considerations are given around modern slavery and human trafficking. This has enabled high risk categories to be identified and addressed accordingly.

All tender purchase terms were again reviewed against current MSA requirements and have been fully updated in line with the 2015 act.

To date, no modern slavery has been identified in our internal operations nor are we aware from our audit and verification processes of any in our supply chains. We will continue to monitor the effectiveness of our existing controls internally, and review annually what improvements may be made to strengthen our auditing and verification procedures.

### **What we are going to do in the future**

With our official MSA lead now firmly embedded, our policies and procedures will be subject to an ongoing review to further engrain the principles of modern slavery and how it can be recognised, reported and avoided. Over the coming year the University will continue its improvements to include:

Ensuring the principles of modern slavery are regularly discussed throughout the year with key employees involved in relevant areas. This will include all staff involved with procurement activity such as tendering and other contractual work.

Train staff on how they can identify and prevent slavery and human trafficking.

Detail what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organization.

Detail what external help is available, to support staff, for example Government training resources and modern slavery helplines.

This statement will be reviewed annually and approved by the Board of Governors.

Gavin Hunter  
Chief Operating Officer  
University of Winchester,