

## **Bangor University Slavery and Human Trafficking Statement**

This statement relates to actions and activities undertaken during the financial year 01 August 2016 to 31 July 2017.

### **Introduction**

Bangor University recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The University is committed to preventing slavery and human trafficking in its corporate activities, and to seeking to ensure that its supply chains are free from slavery and human trafficking.

### **Purpose**

This Statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015 by informing students, staff, companies and the public about the University and its policy with respect to modern slavery, human trafficking forced and bonded labour and labour rights violations in its supply chains. This statement relates to actions and activities undertaken during the financial year 01 August 2016 to 31 July 2017, and to planned actions for the financial year 01 August 2017 to 31 July 2018.

### **Organisational Structure.**

Founded in 1884, Bangor University has a long tradition of excellence and exceeds expectations, both for academic standards and student experience. The University has over 11,000 students and over 2,200 staff based in 23 Academic Schools grouped into five Colleges, and also in various Central Services.

Bangor University currently works with a large number of partners around the world and has formed close links with institutions such as Bahrain Institute of Banking and Finance, Bahrain; Beijing Normal University, China and Central College, USA. The University also has a presence in China through Bangor College China, a joint college with Central South University of Forestry and Technology based in Changsha.

The University has three subsidiary companies – Management Development Centre; Undeb Trading and Menai Science Park Ltd (M-SParc).

### **Mission**

The mission of Bangor University is to be:

“a strong, confident institution recognised regionally, nationally and internationally as a centre of excellence for its varied portfolio of teaching and research, and for the unique, multicultural, inclusive experience it provides for its staff and students”

The University's 2015-2020 Strategic Plan can be accessed from the University website:

<https://www.bangor.ac.uk/planning/strategic-plan/index.php.en>

### **Commitment to Sustainability**

We continue our emphasis on sustainability, integrating all aspects into our daily operations by adopting the framework of the Well-being of Future Generations (Wales) Act 2015. We aim to ensure that all our students leave the University as capable, creative and well-rounded global citizens with an understanding of the challenges and solutions required for a sustainable, resilient world.

### **Ethical Policy Framework**

The University has in place an *Ethical Policy Framework* which embodies its values in principles and practice, applying to all staff, students and members of Council, as well as policies which govern how the University conducts its business.

The Framework can be accessed from the University website:

<https://www.bangor.ac.uk/planning/documents/ethical-policy-frame-en.pdf>

The University seeks to adhere to the highest ethical standards in working to achieve its mission and implement its strategic plan. The aim of this document is to outline a framework which defines the University's standards in general terms. It is acknowledged that individuals hold diverse views on ethical matters.

### **Business and Supply Chains**

The University is committed to acquiring goods and services without causing harm to others.

The University's supply chains mainly fall under five super-categories, which are:

Laboratory Consumables and Equipment

Library Resources

Professional Services

ICT Equipment and Services

Estates Goods and Services

Our initial assessment is that the principal areas of expenditure which carry material risks are office supplies, laboratory consumables, ICT equipment, and construction.

The University is a member of the North Western Universities Purchasing Consortium which procures products for UK higher education institution. Many

suppliers are subject to checks via the Net Positives Supplier Engagement Tool, which partly addresses the requirements of the Modern Slavery Act.

IT Equipment is purchased via the London Universities Purchasing Consortium, who are a member 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.

### **Risk Assessment**

The University has considered the risk of modern slavery and trafficking to its business and supply chains. As in the previous year's statement it is acknowledged that the risk will vary greatly and will change, but that no area or institution is risk free. Having taken into account work undertaken during the last academic year, as outlined below it is believed that Bangor University currently remains in a low risk category and, whilst this should be kept under review, the continued approach taken by the University to its requirements under the Act will be informed by this fact.

The relevant factors considered in this risk assessment are:-

- A small working group of senior staff has been established to consider the requirements of the Act and to continually ensure that appropriate measures are being undertaken;
- Members of staff at the University have attended training during the 2016/17 academic year, and further training for staff has been scheduled for the 2017/18 academic year;
- Human Resources recruitment processes continue to ensure that, for directly employed staff robust process are in place in relation to the Act, and where temporary staff are recruited through agencies these are established and accredited companies who can provide the University with assurances that they fully comply with the requirements of the Act;
- The University continues to seek the highest ethical standards in working to achieve its mission and implement its strategic plan and in particular it's Ethical Policy Framework has been reviewed during the last year;
- Key Policies are in place, and have been updated where necessary:-
  - Procurement Strategy
  - Ethical Policy Framework
  - Strategic Equality Plan
  - Ethical Investment Policy
  - Public Interest Disclosure (Whistleblowing) Policy
  - Anti-Bribery Policy

- Sustainability Policy and our obligations to being 'Globally Responsible' as described in the Well-being of Future Generations Act (Wales) 2015
- On larger contracts, suppliers are required to declare whether they have violated obligations in the fields of environmental, social and labour law and are asked how they ensure that neither they or nor their supply chains are engaged in any elements of modern slavery;

### **Our plans for the future**

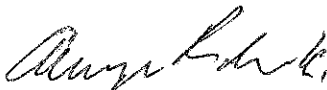

As part of this reporting exercise in this and the coming years, Bangor University affirms its commitment to evolve, improve and work towards a greater transparency and responsibility towards people in relation to slavery and human trafficking. This will be with particular reference to its supply chains and any part of its business.

Key objectives for the coming year will include (a detailed action plan is included as an appendix to this Statement):-

- Continued targeted training for key members of staff as part of wider procurement training in order to raise awareness of modern slavery and trafficking
- Continue to work towards a better understanding of the University's supply chains and towards greater transparency and responsibility for those working on them;
- Implementation of the Code of Practice on Ethical Employment in Supply Chains and its commitments;
- Ensure that this Statement is prominently displayed on the University's website;
- Mapping of those suppliers who fall within potential high risk procurement categories of spend;
- Continue to collaborate with and involve staff and students, and engage with Bangor Students' Union and the Campus Trades' Unions.

### **Statement**

This Slavery and Human Trafficking Statement was approved by the University Council at its meeting on the 29<sup>th</sup> September, 2017

Signed:   
 Position: 

Appendix 1

Modern Slavery Act Action Plan 2017/18  
Completed Actions

Action	Background / Notes	Deadline	Lead Officer	Completed Yes / No
Modern Slavery Statement for 2015/16 and associated Plan for 2016/17 to be presented to the University Council September 2016	The Act requires a Statement for 2015/16 which may include no steps were taken during this year. However the University should highlight limited progress, as well as a detailed plan for 2016/17	30 <sup>th</sup> September, 2016	Director of Finance	Yes Council meeting 30 <sup>th</sup> September 2016 - Minute "Slavery and Human Trafficking Statement" refers
Agree compliance arrangements going forward for monitoring progress during 2016/17	Suggest that Compliance Task Group has oversight of this area. A senior manager should be identified to lead and report on progress	31 <sup>st</sup> October, 2016 (following Compliance Task Group meeting 3 <sup>rd</sup> October, 2016)	University Secretary	Yes Compliance Task Group meeting 3 <sup>rd</sup> October 2016 - Minute 239[e] refers

<p>Publish the Modern Slavery Act Statement on the University website</p>	<p>The Act requires that the Statement is prominently displayed</p>	<p>31<sup>st</sup> October, 2016 (following University Council meeting 30<sup>th</sup> September 2016)</p>	<p>Head of Compliance</p>	<p><b>Yes</b></p>
<p>Include summary in the Annual Report and Accounts</p>		<p>31<sup>st</sup> October, 2016 (following University Council Meeting 30<sup>th</sup> September 2016)</p>	<p>Director of Finance</p>	<p><b>Yes</b> Reference in Annual Report year ending 31<sup>st</sup> July 2016</p>
<p>Ensure targeted staff training has been completed, to key members of staff within the procurement training arrangements</p>	<p>Raising awareness of the Act is essential in order to ensure staff buy in from targeted departments such as Property and Campus Services, Human Resources, Finance, Commercial Services etc.</p>	<p>31<sup>st</sup> July 2017</p>	<p>Director of Procurement</p>	<p><b>Yes</b> Awareness of the Modern Slavery Act is covered within Procurement Procedures Training. 54 members of staff have attended to date, with a further 5 courses arranged for August 2017.</p>

Establish a working group to oversee delivery of the action plan	Ensuring that compliance with the Act's requirements and the Action Plan is essential to ensure University fully compliant	30 <sup>th</sup> October, 2016 (lead senior officer to convene once identified)	Head of Compliance	<b>Yes</b> Deputy Director HR, Director of Procurement and Head of Compliance make up working group
--	--	--	--------------------	---

### Modern Slavery Act Action Plan 2017/18

Action	Background / Notes	Deadline	Lead Officer	Completed Yes / No
Ensure the campus Trades Unions and Bangor Students' Union are aware of the steps taken by the University to comply with requirements	Requirements of the Modern Slavery Act 2015 and the Well-being of Future Generations (Wales) Act 2015	2016/17 Statement and Action Plan to be shared with the campus trades unions and Bangor Students' Union by 30 <sup>th</sup> October, 2017	Head of Compliance	
Ensure Internal Audit and Risk Assurance functions aware of the due diligence processes	Possible internal audit in future	2016/17 Statement and Action Plan to be shared with Head of Risk Assurance by 30 <sup>th</sup> October, 2017	Head of Compliance	

<p>Review and update relevant policies and procedures to include reference to the Modern Slavery Act</p>	<p>Ensure that all relevant policies include information on, and signposting for the Act</p>	<p>31<sup>st</sup> January, 2018 (in readiness for Compliance Task Group)</p>	<p>Head of Compliance and working group</p>	
<p>Implementation of the Code of Practice on Ethical Employment in Supply Chains and its commitments</p>	<p>Consider Code of Practice and Annexes Carry out self-assessment against the Code of Practice commitments.</p>	<p>31st January 2018</p>	<p>Director of Procurement and working group</p>	