

University of Westminster Slavery and Human Trafficking Statement

Financial year ended 31 July 2018

Introduction

This is an update to the University of Westminster's Slavery and Human Trafficking statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015¹ and constitutes the University's slavery and human trafficking statement for the financial year ending 31 July 2018.

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 in order to exploit them for personal or commercial gain.

At the University of Westminster ('the University'), we are committed to improving our practices to combat slavery and human trafficking.

Our structure

The University is an international higher education institution situated in the heart of London with more than 19,500 students in a range of subject areas based in three academic colleges. The University is incorporated under the Companies Act as a company limited by guarantee and not having share capital and is also an exempt charity. The University employs nearly 1,500 staff including teaching and research staff, visiting lecturers and professional support staff.

The following companies are held as investments by the University of Westminster;

Company	Nature of Business
Uniwest (Finance) Ltd	Issue of Promissory Note
Uniwest (Investments) Ltd	Dormant
Uniwest (Property) Ltd	Dormant
University of Westminster (Trading) Ltd	Research, vacation letting of halls of residence
University of Westminster (International)	About to be dissolved
WestmInnovation Ltd	Dormant
(UoW) Regent Street Cinema Ltd	Cinema

The companies are all subsidiary undertakings of the University and all operate in the UK.

The University's annual turnover is £200 million.

The University has a central procurement team that is responsible for procurement and contracting with purchasing devolved to individual faculties and departments. The University is currently a member of the LUPC consortium, which allows any department to make use of the consortium-negotiated agreements and contracts.

The University's Human Resources department provides advice to staff and ensures that HR policies and procedures, including those related to recruitment of staff, are consistently applied across the University.

Our suppliers

The University is committed to working with our partners in business and industry in ways that are mutually beneficial and socially responsible through collaboration, student placement, and entrepreneurial and income generating activities. For large scale construction projects the University request all of its Contractors to be registered with the Considerate Constructors Scheme. The University became an affiliate member of Electronics Watch, which is an independent monitoring organisation assisting public sector buyers to meet their responsibility to protect the labour rights of workers in their global electronics supply chains.

¹ Government guidance is available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final.pdf

These commitments are formalised in the University's Sustainability Charter, a joint statement between the University and its suppliers to agree to work together towards sustainability improvements, best practice and to support the University's initiatives.

Our policies

The University's Corporate Social Responsibility strategy and relevant policies, including an Ethical Code of Practice and Sustainable Procurement Policy, demonstrate our commitment to acting ethically and with integrity in all our business relationships.

The University has in place a Public Interest Disclosure (Whistleblowing) Policy for formal reporting and investigation of concerns about malpractice where criminal offences, such as a breach of the Modern Slavery Act 2015, are suspected. The policy explains the routes open to all persons working or studying at or for the University, including employees, temporary workers, agency staff, people working for sub-contractors, members of the Court of Governors, and non-governor members of Court committees as well as students at the University.

The University mitigates the risk of occurrences of modern slavery in its direct employment of staff through strict adherence to its robust HR recruitment and selection policies.

Our due diligence processes

A Sustainability Impact Analysis was conducted for each of the University's high-spend supplier categories in order to determine the level of risk they presented in terms of the environmental, economic and social impacts. As a result, a set of mitigation actions will be instigated in order to improve sustainability and ensure ethical practices within those supply chains.

The University also conducts due diligence processes for all suppliers who are listed as a 'Preferred Supplier'. For suppliers which are identified as high-risk, the University ensures all necessary due diligence is conducted throughout the tendering process, in respect to the Modern Slavery Act. For example, in order to be considered for an Invitation to Tender (ITT), suppliers will be required to state in the Pre-Qualification Questionnaire (PQQ) that their organisation has never been convicted of offenses relating to modern slavery.

Our future plans

The University of Westminster will continue to closely monitor its supply chains with a view to mitigating any risk of human trafficking, slavery or any form of human rights abuse within those supply chains. The University will apply all due diligence and work in a spirit of openness and transparency with its supplier partners in order to reduce that risk. The University will continue to develop a Sustainable Procurement Action Plan which will help to support this, which may include appropriate training for relevant staff as well as mapping our supply chain and formulating subsequent risk assessments and KPIs.

This statement has been approved by the University Executive Board and will be reviewed and updated, as necessary, on an annual basis.

Dr Peter Bonfield
Vice-Chancellor and President, University of Westminster
20 November 2018