

**Oxford Brookes University: Transparency in Supply chains: Anti
Modern Slavery and Human Trafficking Statement**

Version 3

**Approved by the Vice Chancellors Group
2018/19**

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1. INTRODUCTION

Oxford Brookes 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.

Oxford Brookes University remains committed to supporting the UK Government's National Action Plan, to implement the UN Guiding Principles on Business and Human Rights by following and supporting the Base Code of the Ethical Trading Initiative (ETI).

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 second annual statement to be published under the Act.

2. ABOUT THE UNIVERSITY

The University began building its current estate in the 1950s with the establishment of the Headington Campus and now includes two other campuses at Wheatley and Harcourt Hill as well as a satellite campus in Swindon.

All campuses include libraries, 24-hour computer rooms and social spaces, as well as specialist facilities for the subjects studied there. Generally considered to be the main campus, Headington is split into three sites: Headington Road (Gipsy Lane), Headington Hill and Marston Road. The University also has multiple halls of residence, both on-campus and off-campus.

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 remains zero tolerance, to slavery and human trafficking in any part of its supply chain. Oxford Brookes University actively engages with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

Oxford Brookes University also remain The SUPC Purchasing Consortia have also published policies, to which all its members, including Oxford Brookes University, are committed. These policies aim to ensure 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. STEMed, Laboratory Consumables and Equipment
4. Print and Office Consumables and Equipment
5. Professional Services
6. Travel and Travel Related Services

In our [previous statements](#), we identified the main categories of goods, services and works that present a higher risk of human rights abuses. Oxford Brookes University has maintained and actively promoted transparency and accountability within its supply chains and all procurement processes and activities.

Since then, Oxford Brookes University has advanced its knowledge and understanding of these risks and are continually employing strategies and delivering procurement processes to address them, including embedding the Modern Slavery Act considerations into our procurement process from the Standard Selection Questionnaire through to Contract Management.

Due diligence systems for processes and reporting have now been evaluated to ensure improvements towards risk identification for long-term social, ethical, environmental and financial performance.

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

5. TRAINING

To ensure a high level of understanding, regarding the risks of modern slavery and human trafficking, Oxford Brookes University will continue to provide relevant training for relevant staff.

Oxford Brookes University's central Procurement Team will continue to undertake the Chartered Institute of Procurement & Supply (CIPS) on-line training annual module on ethical procurement and supply.

Oxford Brookes University will continue to work with sector colleagues to share best practice and keep up to date on identifying and assessing risks within our supply chain, including, through involvement with the Purchasing Consortium.

6. DUE DILLIGENCE DEVELOPMENT UPDATE FROM 2017/18

Oxford Brookes University has continued to express its commitment to work towards greater transparency and responsibility within and for the people working within its supply chains. This has been ensured by focusing upon tackling modern slavery to protect vulnerable workers and remedy severe human rights violations.

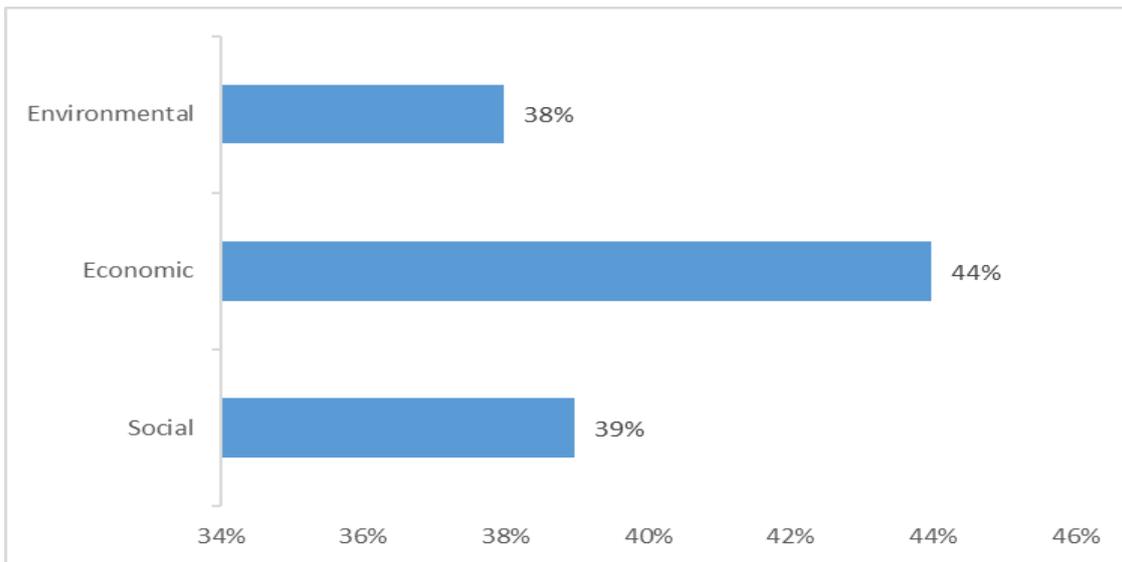
The predominant targets for 17/18 were to create a Supplier Code of Conduct and implement its Net Positive tool. The Net Positive tool is a platform which allows Oxford Brookes University to engage with its supply base by supporting the understanding and acknowledgement of the Modern Slavery Act and its concerns as well a range of other issues including environmental, social and economic factors.

Oxford Brookes University has since identified its key suppliers harmonious with risk and value. Communication was sent out requesting these identified suppliers to accept the [Supplier Code of Conduct](#) and sign up to the Net positive tool.

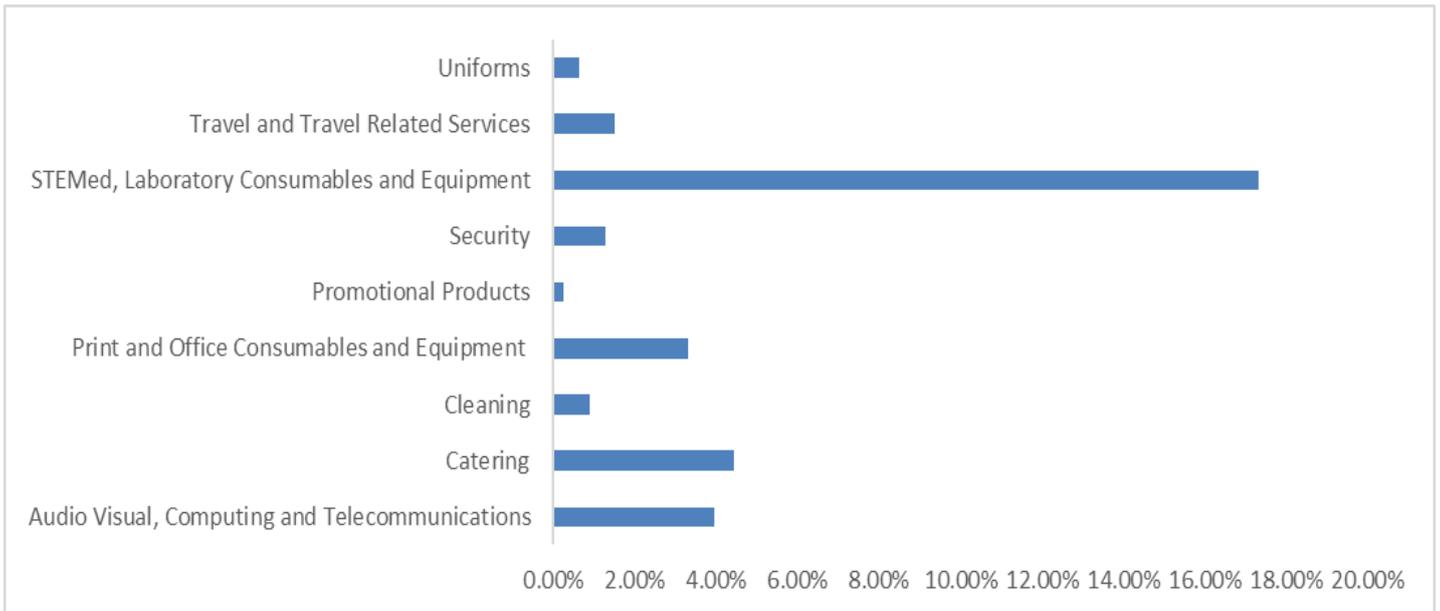
Since this action, all suppliers have accepted the Supplier Code of Conduct and the Net Positive tool has allowed Oxford Brookes University to understand the progress of our suppliers on a number of key issues, including Modern Slavery. The University alongside the tool supports the suppliers in developing an action plan to address key sustainability issues, and help identify elements to investigate such as CSR and Sustainability leads within company changes.

High level figures of improvement for the Net Positive tool include:

- A. A supplier adoption increase from 66 to 785 suppliers.
- B. The supply chain has highlighted 729 high level issues, of which:



- C. The suppliers have committed to 10,131 actions within their action plans based on the above highlighted issues, of which:
 - a. There are currently 2,230 actions in progress
 - b. There have been 2,074 actions successfully completed with full evidence
- D. 97% suppliers have stated that they're aware of Modern Slavery, and how the Act may affect their supply chain; these have been included within their action plans.
- E. There is promising traction of engagement within our high risk super categories:



7. DUE DILIGENCE DEVELOPMENTS FOR 2018/19

The aims and developments planned for 2018/19 include:

To continue to embed Modern Slavery considerations within the procurement process and practice, especially beyond the central procurement team.

To continue to increase knowledge and awareness on Modern Slavery for purchasers across the University.

To explore the data from the Net Positive tool in for detail to ensure we are targeting and supporting high risk and high profile suppliers.

To continue working with peers across the sector to share and learn on the best practice approaches to tackle Modern Slavery within supply chains.

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