

Background explanation to departments

Anti-slavery and anti-trafficking policy – Management of Suppliers (New and Current)

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act').

The University is committed to a zero tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. This policy applies to all employees, workers, consultants, and other persons doing business with the University including all its wholly owned companies, contractors, and suppliers.

The University acknowledges the risk that a supply chain may involve the use of a hidden or unknown subcontractor reliant on forced labour. Although the University as a higher education institution considers the risk of modern slavery to be low due to the nature of its supply chains, it takes its responsibilities to combat modern slavery seriously as demonstrated by its promotion and adoption of the following policy measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the University or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.

This is the edited version of the policy as it relates to the supply chain, for the full version please reference <https://www.registraryoffice.admin.cam.ac.uk/governance-and-strategy/anti-slavery-and-anti-trafficking>

To this end it is necessary for the University to demonstrate that its suppliers are compliant with the Modern Slavery Act 2015 and the University must not trade with them until this has been positively confirmed to you in writing.

Therefore, from 11th September 2018, all requests to Set Up / Amend / Reactivate trade suppliers on CUFS (i.e. not Employees, Students and Individuals) will require you to obtain this confirmation and attach it to your online request.

If you are working with the Finance Division (Procurement Services) and the purchase is part of a formal tender / procurement exercise then the requirements of compliance are part of that process and no further confirmation from the supplier is

required. Please attach the appropriate signed section from the contract to your online request.

In situations which have not involved Procurement Services directly or you have not used the University Contract Templates, you are advised to obtain confirmation by sending the 'Modern Slavery Act Supplier compliance statement' below to the supplier which the supplier must return, and to attach the supplier's response to the online request along with the other relevant documentation e.g. the Companies House document and the VAT information document.

As with all purchasing activity the process should be to make the supplier fully aware of our full terms and conditions before placing any order. Our terms and conditions have been updated to include Modern Slavery Act 2015 requirements and are available on the Finance Division Website. <https://www.admin.cam.ac.uk/cam-only/offices/purchasing/forms/#standard>

If you are in any doubt or suspicious that slavery or human trafficking or any other potential infringements are taking place related to the Modern Slavery Act you should contact Procurement Services or use the University's whistleblowing protocol. <https://www.hr.admin.cam.ac.uk/policies-procedures/whistleblowing-policy-public-disclosure-university-employees>

Reference

University Contract Templates.

<https://www.admin.cam.ac.uk/cam-only/offices/purchasing/forms/#standard>

Anti-slavery and anti-trafficking policy

<https://www.registraryoffice.admin.cam.ac.uk/governance-and-strategy/anti-slavery-and-anti-trafficking>

Whistleblowing policy which can be used to report any instances of modern slavery, which was updated in 2017

<https://www.admin.cam.ac.uk/offices/hr/policy/whistleblowing.html>).

Modern Slavery Supplier Compliance Statement

A. Explanatory Information

Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby individuals are deprived of their freedom and are exploited for commercial or personal gain. The Modern Slavery Act 2015 sets out the relevant criminal offences applicable to everyone. It also requires that, if you are an organisation with an annual turnover of over £36 million, you publish a 'slavery and human trafficking statement'.

The University is committed to a zero tolerance approach to modern slavery and to acting with integrity in all its dealings, relationships, and supply chains. It expects the same high standards from all its staff, suppliers, contractors, and those with whom it does business. The University's Modern Slavery policy applies to all employees, workers, consultants, and other persons doing business with the University including all its wholly owned companies, contractors, and suppliers and can be found at

<https://www.registraryoffice.admin.cam.ac.uk/governance-and-strategy/anti-slavery-and-anti-trafficking>

Before confirming any new suppliers requests or agreeing further business with a supplier, the University requires prior written confirmation from you that you are compliant with the Modern Slavery Act 2015 and with all applicable anti-slavery and human trafficking laws, statutes, regulations from time to time in force whether in the UK or outside the UK if applicable (unless you have a written agreement containing the appropriate clauses). This can be provided by signing the Statement below and returning it to the University Departmental contact.].

B. Statement

You confirm that neither you, your employees, workers or organisation have been convicted of any offence involving slavery and human trafficking nor have been the subject of any investigation or enforcement proceedings regarding any such offence or alleged offence. If you use sub-contractors you agree to use your best endeavours to obtain the same confirmation from them and to ensure that your supply chains are slavery and human trafficking free. You will inform the University immediately if you become aware of any actual or suspected slavery or trafficking connected to your organisation.

You agree that the University may terminate this agreement being made with you including any purchasing order or request or activation request with immediate effect if you are in breach of this statement or if you fail to notify us of any connection to modern slavery or are subject to an investigation, enforcement proceedings or are convicted of any relevant offence.

Signed

Date

Print Name

For and on behalf of