

Modern Slavery Policy Statement

August 2023 to July 2024

1.0 Introduction

This statement sets out Royal Holloway, University of London's policy regarding the requirements of Section 54(1) of the Modern Slavery Act 2015, for the financial year ending 31st July 2024.

Royal Holloway's rich history is deeply rooted in creating positive change. Our history of championing social change and inclusion underpins everything we do today. As a University of Social Purpose, our dedication to inclusive education and impactful research allows us to empower our global community of students, colleagues, and partners to make a real difference in the world.

The University recognises the risks of modern slavery, in particular in the supply chains of the goods and services purchased. This statement sets out these risks and our approach to mitigation.

2.0 Identified Risks

The University procures a wide range of goods, services and works, used in its academic and research activities and for its routine business operations. These fall into the following broad categories: Scientific Consumables and Equipment, Library Resources, Professional Services, ICT Equipment and Services & Estate Works and Services.

Within these categories the following types of contracts are likely to carry the highest risks in relation to modern slavery and human trafficking: Construction, Catering Supplies, Cleaning Services, ICT Equipment and Services, Scientific Consumables & Office Supplies.

3.0 Our commitment

The University is committed to carrying out procurement activities in an environmentally, socially, ethically and economically responsible manner and to entering into agreements, and contracts, with suppliers that share and adhere to this vision.

The University has adopted the Sustain Supply Chain Code of Conduct, which has been collaboratively developed and reviewed by the Sustain Project, members including APUC, LUPC, HEPA, EAUC, various HE/FE institutional Procurement and Sustainability leaders, NUS (and other student associations) and People & Planet. It is based on the Ten Principles of the UN Global Compact.

The University expects all its suppliers to comply with its Supply Code of Conduct (<https://rebrand.ly/royalholloway-supplierportal>) which covers the following:

- Social compliance, for example no use of forced or under aged labour, the provision of suitable working conditions and fair treatment of workers.
- Ethical compliance and economic development, for example acting with integrity, compliance with laws and regulations, and support of fair trade.
- Environmental compliance, for example avoidance of environmental harm and taking actions to reduce environmental impact.

The University is a member of the London Universities Purchasing Consortium which considers responsible procurement throughout all of its activities and is considered a leader in this field. The University uses LUPC's Commodity Coding Risk Analysis tool to mitigate supplier risks.

The University is an affiliate member of Electronics Watch (<https://electronicswatch.org/en>), which is an independent monitoring organisation that works with public sector organisations to promote and enable responsible procurement and protect the rights of workers in electronic supply chains.

4.0 Statement on the University's policy in relation to modern slavery and human trafficking

Royal Holloway, University of London, commits to acting in an ethical manner and with integrity in its business relationships to implement processes that ensure modern slavery and human trafficking are not taking place in the University's supply chains.

The University does not wish to support or deal with any business knowingly involved in modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

The University is committed to tackling modern slavery issues as they may arise in respect of recruitment procedures, and will act in compliance with legal requirements under the Act. The University only wishes to work with employment agencies which likewise comply with the Act. We will apply selection and recruitment practices that help identify and tackle modern slavery.

The University encourages all colleagues, students and visitors to report any concerns relating to its direct activities and in respect of its supply chains where they believe there is or maybe a risk of non-compliance with this policy.

5.0 Actions taken during 2023-24

- Our RH2030s strategy was developed during the year and marks a milestone in Royal Holloway's journey as a University of Social Purpose. The theme of social purpose is at the heart of RH2030s and runs through all of the University's Strategic Ambitions.
- The University has pursued accreditation by the Living Wage Foundation during the year, to recognise the University's commitment to the Living Wage for its employees and for those providing a service via a third-party supplier on University premises. (Further to this work, accreditation is expected to be achieved in the first six months of 2024-25.)
- Modern Slavery is included in every higher-cost procurement exercise as standard. The University aims for a scoring of 10% to relate to social value. For example, during 2023-24 it was considered as part of the procurement for the following goods and services:
 - Procurement of an Ultra High Vacuum (UHV) Josephson Junction Fabrication Tool for Superconducting Quantum Circuits and Associated Requirements
Value – £481,000
Open tender procedure under the Public Contract Regulations (PCR)
 - Founders Lift Modification
Value – £400,000
Open tender process

- Chestnuts Refurbishment
Value – £2.2m
Tendered through the RHUL Major Works framework and additional preselected contractors. A total of five contractors were invited to tender (closed competition).

- Training has been undertaken in the Procurement team on the new Procurement Regulations which come into force in 2025 and include a greater emphasis on social value as a key criterion of procurement activities. The Procurement team are enrolled on the official Procurement Act 2023 training modules, which are the key learning product to support practitioners in implementing the new regime.
- The University has reviewed and updated its Donation Acceptance Policy during 2023-24 to include greater emphasis on social purpose, including the clear provision that donations will not ordinarily be accepted where there are breaches of human rights.

6.0 Ensuring adherence to this policy

Royal Holloway will make available this policy to all students, colleagues, suppliers and the public, together with plans and procedures that will impact the supply chain management in respect of modern slavery, human trafficking, forced and bonded labour and labour rights violations. The University will assess instances of non-compliance and take remedial action as appropriate.

7.0 Plans for the Future

Royal Holloway is implementing an action plan which will be subject to annual review.

The University will

- Achieve accreditation by the Living Wage Foundation.
- Undergo an Internal Audit review of Procurement January 2025
- Continue to adopt the Sustain Supply Chain Code of Conduct. The Code sets out social, environmental, and ethical standards that suppliers are expected to comply with.
- Undertake research and benchmarking activities to inform our approach.
- Continue to develop an up-to-date suite of University standard contract templates to include appropriate modern slavery terms and conditions.
- Continue to provide awareness and training as appropriate to all colleagues who are involved in the procurement of goods and services.
- Continue to work with Electronics Watch to coordinate supplier compliance and due diligence in relation to this legislation.
- Explore new opportunities for action with the Head of Sustainability.
- Follow the latest advice and recommendations published by the Chartered Institute of Procurement and Supply (CIPS) regarding Modern Slavery and Human Trafficking in the supply chain.

This statement will be reviewed and updated on an annual basis.

Approved by Council 21st November 2024

Signed: 

Professor Julie Sanders
Vice-Chancellor & Principal