Modern Slavery and Human Trafficking Statement

Introduction

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. Birkbeck, University of London has a zero tolerance policy in relation to modern slavery and is committed to protecting and respecting human rights through continuous improvement of practices.

This statement is made pursuant to section 54(1), Part 6 of the Modern Slavery Act 2015 and constitutes the Group’s slavery and human trafficking statement for the financial year ended 31 July 2017.

Organisational structure

Birkbeck College, University of London is a provider of full time and part time courses in the higher education sector and one of the few institutions specialising in evening higher education. Based in the heart of Bloomsbury, Birkbeck is a leading research university and a vibrant learning community offering over 200 undergraduate and postgraduate programmes. Academic activities are organised into five schools which are subdivided into nineteen departments.

Founded in 1823 by the philanthropist Dr George Birkbeck, the College is a body incorporated by Royal Charter and an exempt charity under the terms of the Charities Act 2011. Under the Charities Act universities are supervised by the Higher Education Funding Council for England (HEFCE) as principal regulator, who are charged with ensuring that universities fulfil their obligations under Charity Law.

During the year the College reported annual turnover of £109 million and employed 1163 full time equivalent staff. The College wholly owns a subsidiary called Birkbeck College (Cambridge House) Limited.

Our Commitment

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all of our business relationships. We continue to implement and enforce effective systems and controls and use all reasonable endeavours to ensure that slavery and human trafficking are not taking place in our supply chain.
Human Resources
The College’s comprehensive range of policies and procedures set out our commitment to workplace rights and ensure that our employees are treated fairly with dignity and respect. These policies, which are reviewed regularly, include, but are not limited to:

- **Equality and Diversity** - sets out the College’s legal obligations under the Equality Act 2010 and the various ways in which the College meets its duties
- **Dignity at Work and Study** - is intended to support the College’s provision of an inclusive working and learning environment
- **Formal Grievance and Disciplinary and Dismissal Procedures**
- **Public Interest Disclosure (“Whistleblowing”)** - enable staff to report improper conduct or unethical behaviour.

The College uses the national single pay spine structure which is operated by most higher education institutions in the UK and has safeguards to ensure that the hourly rate of pay to staff does not fall below the current London Living Wage.

To inform the institution of possible inconsistencies between policy and practice, the College undertakes institution-wide Staff Surveys, which include questions about the experiences of staff in relation to instances of bullying/harassment/discrimination and the ability to manage work-life issues as employees of the College.

The results are compared against past surveys and sector benchmarks. Action plans are developed to tackle issues that are identified. The Survey results, analysis and actions are shared within the institution and included in the institutional Athena SWAN submission.

Procurement procedures
As part of our continuing commitment we engage with bidders of College contracts to understand their approach to combatting modern slavery in the supply chain and encourage potential suppliers to identify their awareness of modern slavery and human trafficking. We have reviewed our supply base through the Procure to Pay review and updated supplier company information which allows for effective engagement.

Raising awareness
An overview of the act will be available to all staff at the College alongside this statement. Staff will be encouraged to familiarise themselves with the key requirements of the act and their responsibility as individuals to report behaviour, which they believe suggests a breach of the act, to designated Birkbeck staff. We will seek to identify training opportunities available.

Supply chains and risk areas
During the year we established a central team of dedicated procurement professionals who manage procurement processes and provide support and guidance within the organisation. While the risks of modern slavery in our direct activities is likely to be low, we recognise that there are risks through the goods and services that we procure linked to supply chains around the world. We
continue to access a series of frameworks through the use of consortia and the suppliers we use to deliver our activities, and our own operations, continue to be primarily UK and EU based.

We contract with a range of suppliers, from large international IT companies to local cleaning, catering, security companies and suppliers providing manual or lower skilled workers for services that are likely to be at greater risk of exploitation – e.g. cleaning companies, or workers producing technology components for IT goods overseas. These areas will continue to be the focus of our attention in the coming year and we will evaluate a small number of first-tier (direct) suppliers in these areas in 2017/18.

Further steps

We seek to continually improve our approach and following a review of the effectiveness of the steps we have taken during the year we intend to take the following steps to combat slavery and human trafficking in our supply chain in the coming year.

Human Resources
The College's policies and procedures will continue to be reviewed regularly and monitoring of modern slavery will continue to be incorporated into the annual staff survey.

Procurement procedures and raising awareness
During the coming year we will:

- continue to train the procurement team in the requirements of the Modern Slavery Act and raise awareness of the act through College wide communications
- continue to embed the requirements of the act into procurement policies, procedures and processes
- review and amend our contract terms to respond to the provisions of the act, including reserving the right to terminate contracts with suppliers in the event that there is evidence of serious violation
- categorise the supply chain and evaluate a small number of first tier (direct) suppliers and undertake risk assessments and seek to obtain anti-slavery and human trafficking statements from all companies required to produce such statements

Approved by

For and on behalf of Birkbeck College, University of London

December 2017