

SLAVERY AND HUMAN TRAFFICKING STATEMENT

The following statement is made by the University of York in acknowledgement of section 54(1) part 6 of the Modern Slavery Act 2015 (MSA 2015) and sets out the steps that the University has taken to prevent slavery and human trafficking taking place in our supply chains or in any part of our core activities. The University is committed to ensuring that it combats slavery and human trafficking throughout its organisation and supply chains. This annual statement covers the 2023/24 financial year which ended 31 July 2024.

Our organisational structure

As a member of the UK Russell Group of research-intensive universities, the University of York carries out high quality research across a wide range of disciplines and provides a range of higher education courses, teaching and academic services in over 40 academic departments and research centres. It has a student body of over 20,000.

The University is a body incorporated under a Charter of Incorporation granted by the Queen in 1963, is an exempt charity and regulated by the Office of Students. The University's governing body is the Council which is ultimately responsible for overseeing the University's activities, determining its future direction and monitoring progress against its strategic ambitions. The Council is also responsible for ensuring that the University remains financially sustainable and that it complies with its legal obligations. It takes the final decision on matters which have a significant impact on the University.

While the Council takes on a monitoring and oversight role as the governing body, it delegates the operational running of the University to the Vice-Chancellor and President, statutory committees and the University Executive Board. [Read more about how the University is run.](#)

Our policies and actions to prevent slavery and human trafficking

The University of York has a zero tolerance to slavery and human trafficking. Its Code of Practice and Principles for Good Ethical Governance is followed when undertaking any academic activities. This is reinforced in the University's Strategic

Aims for delivering research for the public good. This Code gives particular consideration to activities conducted overseas or in collaboration with overseas partners, in countries or under regimes with poor human rights records or identified as unsafe or high risk by the Foreign & Commonwealth Office. The University remains alert to the potential for slavery and human trafficking within its domestic supply chain and also challenges itself to consider and assess more proximate risks.

Other policies and actions include:

- Ensuring that the recruitment of employees or workers or via agencies at the University and its subsidiary companies are subject to appropriate right to work checks and visa compliance.
- Having in place policies which allow communication and escalation of any risk of slavery or human trafficking ([Speak Up \(Public Interest Disclosure\) policy](#), whistle-blowing policies, [Dignity at Work and Study policy](#), [Employee grievance procedure](#)).
- Carrying out appropriate due diligence of third parties supplying services and goods to the University.

Also, the University and its subsidiaries continue to identify and mitigate any risks of slavery or human trafficking arising from any supply chains or contracts. The University is working in collaboration with Netpositive Futures and has continued to embed an [online supplier engagement tool](#), developed in conjunction with the [Stockholm Environment Institute at York](#), which increases awareness of sustainability issues and allows us to:

- Establish a single mechanism to engage contracted suppliers with the issues of Modern Slavery.
- Provide support and guidance to our supply base and share best practice.
- Track the actions being taken and progress being made by our supply chain in addressing aspects of modern slavery.

In addition, the University is registered in its own right with the Netpositive supplier engagement tool as a provider of services to other organisations.

The University has signed up as a member of the [Good Business Charter](#) which includes ethical sourcing as one of its 10 components, aligning to the [Ethical Trading Initiative Base Code](#).

Our teaching and academic research

Professor Tomoya Obokata, from the University of York's Law School, presented his independent report on modern slavery and forced labour to the UN Human Rights Council in Geneva. The report, which highlights human rights concerns in many countries, including the UK. Professor Obokata conducted independent analysis of testimonies from NGOs, alleged victims and independent academic reports and wider consultation.

Supply Chain: Risk assessment, prevention and mitigation

The University perceives the main risk of slavery and human trafficking to be in the high spend supply chain areas of Property Management & Construction, IT, Laboratory Supplies and Catering. Through work on our supplier engagement tool we are addressing each area in turn to look at the strategies our supply chain has in place to ensure the risk of slavery and human trafficking is minimised.

For example, the following actions have taken place:

- Property Management & Construction: All timber related products procured by the University are [Forest Stewardship Council \(FSC\) certified](#) with full chain of custody meaning the timber and timber products are from suppliers who maintain or enhance the social or economic wellbeing of their workers.
- The University uses a number of framework agreements in the IT and electronic goods areas. The purchasing consortia who own these frameworks take active steps to mitigate the risk of abuses occurring in supply chains e.g. through the Sustain Supply Chain Code of Conduct. Many of the University's suppliers of high volume, repeat purchases (such as laptops) are monitored by Electronics Watch for possible human rights abuses, benchmarked for worker wellbeing by KnowTheChain and audited by the Responsible Business Alliance.
- The purchasing consortium responsible for the framework agreements for laboratory consumables that the University uses has undertaken assessments of plans in place with suppliers to ensure all their supply chains are in accordance with the Ethical Trading Initiative Base Code.

- The University's catering outlets and services continue to use Fair Trade and ethically sourced products. The University itself works with [Pelican Procurement Services](#) to source catering suppliers as it carries out a high level of due diligence (e.g. visiting premises) to ensure MSA 2015 compliance.

Due diligence processes

The University recognises that proper due diligence is essential to ensuring there is no human trafficking or slavery occurring in its supply chains. For that reason it uses the NETpositive supplier engagement tool, and undertakes an engagement programme with its key suppliers in order to address the risks associated with modern slavery and the actions in place to mitigate these risks.

The University has adopted the Sustain Supply Chain Code of Conduct, developed and promoted by the UK Universities Purchasing Consortia (UKUPC), to demonstrate its commitment to carrying out procurement activities in a socially and ethically responsible manner. This is now applied and expected of all of our successful tenderers when entering into agreements and contracts following a University-led invitation to tender.

Where the University is contracting directly it now employs the UKUPC goods and services agreement to ensure a sector-consistent approach; this includes anti-slavery and human trafficking clauses with an obligation to maintain a complete set of records to trace the supply chain of all Goods and/or Services provided.

As part of the University sustainability plan and to focus our efforts, a Kraljic matrix has been developed to identify the criticality of suppliers to the University and the most appropriate mechanisms for mitigating the risks inherent in those relationships. Modern slavery forms part of the "local and global supply chain forces" element of assessment.

Developments in 2023/24 and our future actions

- In 2023/24 the University assigned training in the form of an e-learning course on Protecting Human Rights in the Supply Chain to key purchasing decision makers to ensure that they are aware of the risks associated with modern slavery and can apply that learning to their decision making going forward.
- In 2023/24, in collaboration with Electronics Watch, an initial risk assessment report was produced within the University IT hardware supply chains.

- In 2024/25 the University will commence an audit of the catering supply chain in conjunction with Pelican, to determine the steps taken to mitigate the risk of slavery and human trafficking occurring and any subsequent developments needed.
- In 2024/25 training materials will be publicised and made more accessible to University staff who make purchasing decisions to highlight the risks of slavery and human trafficking.

This statement will be reviewed annually to monitor progress in minimising the risk of slavery and human trafficking occurring in any part of the University's supply chains or core operations. Any queries regarding this statement should be addressed to sustainability@york.ac.uk.

Vice-Chancellor

January 2025