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## Toilets, Bodies, Selves: Enacting Composting as Counterculture in Hawai'i

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**University of Westminster Slavery and Human Trafficking Statement  
Financial year ended 31 July 2020**

**Introduction**

This is an update to the University of Westminster’s Slavery and Human Trafficking statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015<sup>1</sup> and constitutes the University’s slavery and human trafficking statement for the financial year ending 31 July 2020.

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 to exploit them for personal or commercial gain.

At the University of Westminster (‘the University’), we are committed to improving our practices to combat slavery and human trafficking.

**Our structure**

The University is an international higher education institution situated in the heart of London with more than 19,000 students in a range of subject areas based in three academic colleges. The University is incorporated under the Companies Act as a company limited by guarantee and not having share capital and is also an exempt charity. The University employs approximately 1,600 colleagues including those delivering teaching and research, visiting lecturers and those working in professional services.

The following companies are held as investments by the University of Westminster;

<b>Company</b>	<b>Nature of Business</b>
Uniwest (Finance) Ltd	Issue of Promissory Note
Uniwest (Investments) Ltd	Dormant
Uniwest (Property) Ltd	Dormant
University of Westminster (Trading) Ltd	Research, vacation letting of halls of residence
University of Westminster (International)	Dissolved
WestmInnovation Ltd	Dormant
(UoW) Regent Street Cinema Ltd	Cinema

The companies are all subsidiary undertakings of the University and all operate in the UK.

The University’s annual turnover is £216 million.

The University has a central procurement team that is responsible for procurement and contracting with purchasing devolved to individual faculties and departments. The University is currently a member of the LUPC consortium, which allows any department to make use of the consortium-negotiated agreements and contracts.

The University’s Human Resources department provides advice to colleagues and ensures that HR policies and procedures, including those related to recruitment of colleagues, are consistently applied across the University.

**Our suppliers**

The University is committed to working with our partners in business and industry in ways that are mutually beneficial and socially responsible through collaboration, student placement, and entrepreneurial and income generating activities. For large scale capital construction projects, the University request all of its Contractors to

<sup>1</sup> Government guidance is available at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/471996/Transparency\\_in\\_Supply\\_Chains\\_etc\\_A\\_practical\\_guide\\_final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final.pdf)

be registered with the Considerate Constructors Scheme. The University is an affiliate member of Electronics Watch, which is an independent monitoring organisation assisting public sector buyers to meet their responsibility to protect the labour rights of workers in their global electronics supply chains.

These commitments are formalised in the University's Supplier Sustainability Charter, a joint statement between the University and its suppliers to agree to work together towards sustainability improvements, best practice and to support the University's initiatives.

## **Our policies**

The University's Commitment to Responsible Procurement document and Sustainability Policy outline our approach to acting ethically and with integrity in all our business relationships.

The University has in place a Public Interest Disclosure (Whistleblowing) Policy for formal reporting and investigation of concerns about malpractice where criminal offences, such as a breach of the Modern Slavery Act 2015, are suspected. The policy explains the routes open to all persons working or studying at or for the University, including employees, temporary workers, agency staff, people working for sub-contractors, members of the Court of Governors, and independent (non-governor) members of Court committees as well as students at the University.

The University mitigates the risk of occurrences of modern slavery in its direct employment of colleagues through strict adherence to its robust HR recruitment and selection policies.

## **Our due diligence processes**

A Sustainability Impact Analysis was conducted for each of the University's high-spend supplier categories in order to determine the level of risk they presented in terms of the environmental, economic and social impacts. As a result, a set of mitigation actions will be instigated to improve sustainability and ensure ethical practices within those supply chains.

The University also conducts due diligence processes for all suppliers who are listed as a 'Preferred Supplier'. For suppliers which are identified as high-risk, the University ensures all necessary due diligence is conducted throughout the tendering process, in respect to the Modern Slavery Act. For example, to be considered for an Invitation to Tender (ITT), suppliers will be required to state in the Pre-Qualification Questionnaire (PQQ) that their organisation has never been convicted of offenses relating to modern slavery.

As part of our commitment to the Modern Slavery Act, the University has included in its standard terms and conditions a number of clauses to ensure that the suppliers we do business with understand the risks of modern slavery in supply chains and take appropriate action to identify and address those risks.

## **Our future plans**

The University of Westminster will continue to closely monitor its supply chains with a view to mitigating any risk of human trafficking, slavery or any form of human rights abuse within those supply chains. The University will apply all due diligence and work in a spirit of openness and transparency with its supplier partners to reduce that risk. The University's revised Supplier Sustainability Charter will be further communicated to our suppliers and made publicly available on our website to show our commitment to meet our procurement needs in a way that has minimal impact on society and the environment.

The University will continue to develop a Responsible Procurement Action Plan that will help to support this, which may include appropriate training for relevant colleagues as well as mapping our supply chain and formulating subsequent risk assessments and KPIs.

This statement has been approved by the University Executive Board and will be reviewed and updated, as necessary, on an annual basis.



**Dr Peter Bonfield, Vice-Chancellor and President, University of Westminster**  
**10 November 2020**