

Governance and Compliance Division

Anti-slavery and Anti-trafficking Statement and Policy

Anti-slavery and anti-trafficking statement and policy

19 November 2020

In accordance with Section 54 of the Modern Slavery Act 2015, the University is required to prepare an anti-slavery and anti-trafficking statement for each financial year, setting out what steps it has taken to ensure that modern slavery is not taking place in its business or supply chains. The University's statement for the financial year ended 31 July 2020 is published below, together with its policy on the issue.

Anti-slavery and anti-trafficking statement for the financial year ending 31 July 2020

(pursuant to Section 54(1) of the Modern Slavery Act 2015)

Legal status and activities

The University of Cambridge is a common law corporation and is an exempt charity under the Charities Act 2011. The incorporation of the University was confirmed by the Oxford and Cambridge Act 1571, which confirmed its corporate title of 'The Chancellor, Masters, and Scholars of the University of Cambridge'. The University operates in the higher education sector and consists of academic Schools, Faculties and Departments, libraries and other collections, administrative departments and, for the purposes of this statement, includes its wholly owned companies as listed in the University's Financial Statements. Its mission is to contribute to society through the pursuit of education, learning, and research at the highest international levels of excellence.

Cambridge Assessment (which provides examination services) and Cambridge University Press (which provides publishing services) are departments of the University rather than separate legal entities. Cambridge Assessment is covered by this statement. Cambridge University Press, however, has broader supply chains and consequently has produced its own anti-slavery and anti-trafficking statement.

Policy

The University has implemented an Anti-slavery and anti-trafficking policy (published below) reflecting its commitment to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. The policy outlines

how the University's various procurement and HR practices, policies and procedures ensure compliance with its policy commitment.

Activity in the year ending 31 July 2020

Throughout 2019–20, the University has continued to embed and enhance the various controls and activities outlined in its policy, notably through the ongoing roll-out of its online training module on this topic, and the continued refinement and operation of supplier due diligence and approval procedures.

The University did not receive any reports of instances of modern slavery or human trafficking in the financial year ending 31 July 2020.

The University will continue to raise awareness of modern slavery and human trafficking and of the need for proper due diligence and risk assessment processes to be applied by staff and suppliers, in accordance with its policy.

This annual statement was approved by the Council on 19 November 2020.

Anti-slavery and anti-trafficking policy

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 defined in the Modern Slavery Act 2015. The University is committed to combatting slavery and human trafficking 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. It applies to Cambridge Assessment though not to Cambridge University Press, which has developed its own policy.

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. The University's standard procurement and contract procedures and documentation address anti-slavery and anti-

trafficking. The trade supplier portal asks questions of potential new suppliers on their compliance with the Modern Slavery Act 2015 as part of due diligence processes. Under the supplier approval process the University's Finance Division reviews all new suppliers, any changes to existing suppliers and re-activation requests taking this into account.

- The University has developed an online training module on anti-slavery and anti-trafficking and completion is required or encouraged for a range of relevant new and existing employees, including all Finance Division staff and those in financial or purchasing roles across the wider University.
- The University highlights modern slavery issues within its ongoing communications programmes with the University's Departments, Faculties and other Institutions and with current trade suppliers to maintain and increase awareness of the issue.
- The University encourages anyone to raise any concerns about modern slavery, using its whistleblowing policy if necessary, and will support anyone who acts in good faith.
- The University's recruitment, Dignity @ Work, equalities, and remuneration and reward policies and procedures support its efforts to combat modern slavery and human trafficking.
- Cambridge Assessment has equivalent provisions in its separate procurement, whistleblowing and HR policies and procedures.
- The University will continue to develop its commitment to combat modern slavery and human trafficking and will outline such activities within its annual anti-slavery and anti-trafficking statement.

Any breaches of this policy may result in the University taking disciplinary action against individual(s) and/or terminating its relationship with any organization or supplier.

This policy is managed by the Governance and Compliance Division and was last approved by the Council on 19 November 2020.

Related links

[Modern Slavery Act 2015](#)

[HR policies and procedures](#)

[Related measures for Cambridge University Press](#)
