

**GOLDSMITHS
University of London**

COUNCIL

21 September 2016

SLAVERY AND HUMAN TRACKING STATEMENT

Pursuant to Section 54 of the Modern Slavery Act 2015, every incorporated commercial organisation supplying goods and services with a turnover of £36 million or more per annum is required to produce a Slavery and Human Tracking Statement for each financial year. Although the Courts have yet to determine which organisations are to be considered 'commercial', guidance from the Secretary of State suggests that those corporations which pursue primarily charitable or educational aims will be included.

The Statement must include the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. This does not mean that the organisation in question must guarantee that the entire supply chain is slavery free. Instead, it means an organisation must set out the steps it has taken in relation to any part of the supply chain (that is, it should capture all the actions it has taken).

The Statement must be approved by the board of directors and signed by a director (or equivalent). The Modern Slavery Act 2015 requires each organisation to publish a slavery and human trafficking statement on their website and include a link in a prominent place on its homepage.

Below is a draft Statement for Goldsmiths' College's 2015-16 financial year (below), recommended to Council by the Senior Management Team.

Subject to receipt of approval by Council, the Statement will be published on the College's website on 22 September 2016.

Examples of Statements published by organisations to date can be found here: <https://business-humanrights.org/en/uk-modern-slavery-act-registry>.

Council is invited to consider and approve the draft Statement for publication.

**Ms Claire MacLean
Interim Registrar and Secretary
September 2016**

Modern Slavery Act 2015 Policy and Statement

Goldsmiths University of London

Goldsmiths, University of London began life as the Goldsmiths' Company's Technical and Recreative Institute, opened with pomp and pageantry by the Prince of Wales in July 1891. 2014-15 saw Goldsmiths enter its 125th year, having built on modest origins as an educator of the 'industrial working and poorer classes' to claim its place at the forefront of creative and cultural thought and practice.

Goldsmiths, University of London continues to enjoy a global reputation for its leading and challenging work in the arts, humanities, social sciences and computing. Our commitment to the highest academic standards of teaching and research underpins all that we do. Goldsmiths brings creative and unconventional approaches to all of its subjects. It values tolerance and diversity, and the freedom to experiment, to think differently and to be an individual.

Goldsmiths is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.

Goldsmiths fully supports the government's objectives to eradicate modern slavery and human trafficking and has committed to pay its contracted staff the London Living Wage (LLW) since 2011. Goldsmiths' efforts have now officially recognised by the LWF with the signing of a licence to support the continued commitment to the initiative.

We engage with a large number of private and public sector organisations in pursuit of our procurement and investment activities.

Goldsmiths Supply chain

Our procurement activities take place mainly in England; and our contractors and suppliers are predominantly UK and EU based.

Our total non-pay spend for 14/15 was c. £33m.

Where possible we access frameworks set up by regional purchasing consortia e.g. London University Purchasing Consortia (LUPC) and Crown Commercial Service (CCS) for goods and services required in the pursuit of our core business. In 2014/15 year we procured c. £6.8m through 37 such framework agreements.

These Frameworks enable us to call off non-core services and expertise covering areas such as hard and soft FM, IT and HR services, together with their associated goods, materials and labour-related supply chains.

In addition to the above Goldsmiths procure goods, services and works predominantly from small and medium-sized enterprises (SME companies) based in the UK or the EU.

Goldsmiths expects its 1st Tier Suppliers to ensure their goods, materials and labour-related supply chains are:

- Fully compliant with the Modern Slavery Act 2015; and
- Transparent, accountable and auditable;

(A) Management responsibility and general awareness

We have:

- Agreed management responsibility for this policy and statement which has received endorsement from our Senior Management Team and Council.

(B) Risk assessment

We have:

- Undertaken an assessment by our legal and procurement teams to determine our risk exposure.
- Included the Modern Slavery Act 2015 within our Compliance Risk Register to ensure the risk continues to be flagged, assessed and appropriately addressed.

(C) Risk mitigation

We have:

- Added a provision to our tender documentation which includes the mandatory exclusion of any bidder who has been convicted of an offence under section 1, 2 or 4 of the Modern Slavery Act 2015.

Steps to take from August 2016 – Year 2

(A) Management responsibility and general awareness

We will:

- Raise general organisational awareness by circulating an article to all staff explaining progress in preparing this statement.
- Report progress to our Senior Management Team and our Council.
- Raise awareness of this published statement by notifying Suppliers with which we regularly engage.
- Prepare the second annual statement.

(B) Risk assessment

We will:

- Commence a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
 - Assessing and interpreting any recent or emerging case law and best practice; and
 - Benchmarking our activities against statements and action plans undertaken by similar public organisations.
 - Re-evaluating the risk of non-compliance as part of our Risk Register assessment.

(C) Risk mitigation

We will:

- seek to include new provisions for termination of contracts in the event of a modern slavery or human trafficking compliance breach by the supplier.
- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into risk management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Goldsmiths' slavery and human trafficking statement for the financial year ending 31 July 2016.