2018 Modern Slavery Statement

Goldsmiths University of London

Goldsmiths’ third Modern Slavery 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 2018.

This statement provides an update on actions taken by the College in the past 12 months and priorities for the coming 12 months to demonstrate Goldsmiths’ continuing commitment to the highest level of ethical standards and sound governance arrangements.

Goldsmiths Organisational Structure

The governing body of the College is Council, which is composed of a mixture of independent (lay) members, members of staff of the College, and representatives of the Students’ Union. The College is a charitable body established by Royal Charter, and as trustees of the charity members of Council must ensure that its funds are applied to the objectives defined in the Charter.

The Senior Management Team (SMT) are responsible for overseeing the academic and administrative leadership of the University. Each member has responsibility for managing different areas from strategic development to academic development.

Due Diligence Process

The College engages with a large number of private and public sector organisations in the pursuit of our strategic objectives. These procurement activities take place mainly in England; and our contractors and suppliers are predominantly UK and EU based.
Our total impactable spend* (including Capital) for 17/18 was c. £24.5m (excl VAT).

* spend figure has been adjusted to exclude the following categories:-

- Bursaries and scholarships, Cost of placements
- University subsidiaries, Conference fees, Membership and affiliation fees (including payments to professional bodies)
- Payments to other institutions incl students' union and trade unions, charities, schools, NHS (e.g., franchised placements) or HMRC
- Payments to banks, interest charges, depreciation, pension costs and bad debts etc.
- Payments to individuals (e.g., staff costs included under the Op Ex category)
- Payments in relation to grants, training, research bodies etc.
- Rent and rates and planning fees to local authority

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 2017/18 year we procured c. £8.85m (36% of our impactable spend) through 43 such framework agreements covering the following Categories:

- Estates Services (Cleaning, Security, Facilities Management)
- IT (hardware and install)
- Library
- AV
- Professional Services (Insurance, Legal, Temp labour)
- Travel
- Office Supplies
- Utilities

The use of pre-negotiated Frameworks enables the College to call off non-core services knowing that supplier’s credentials have been tested during the selection process. The LUPC also state that they are committed to supporting the UK Government’s national Action Plan to implement the UN Guiding principles on Business and Human rights, and they have already identified material risks in the IT Hardware and Estates Services categories where Hardware originates from East Asia, China, India, Eastern Europe, Mexico and Cleaning & Security services resourced from the UK.

In addition to the use of Framework agreements Goldsmiths also procures goods, services and works predominantly from small and medium-sized enterprises (SME companies) based in the UK or the EU. The Top 10 non-Framework spend totals a further £7m covering the following categories:

- Estates Services (Main Contractors and Facilities Management)
- Catering
- IT (Software Development & Hardware Maintenance)

As the IT and Estates categories account for c. 50% of the College’s total impactable spend they are also the areas where we will concentrate our efforts over the next 12 months.

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;
- Transparent, accountable and auditable; and
- Obtaining similar assurances from their supply chains
Steps taken by Goldsmiths since August 2017

(A) Risk assessment
We have:
• Taken part in a pilot study to test an online Risk assessment tool developed by LUPC as part of their Responsible Procurement strategy.

(B) Risk mitigation
We have:
• Met with our Cleaning and Security management teams to discuss the steps they take to minimise the risk of Modern Slavery in their contracts with Goldsmiths.

(C) Management responsibility and general awareness
We have:
• Ensured every member of the Procurement team has completed the HEPA eLearning module “Protecting Human Rights in the Supply Chain”
• Prepared our third annual statement.
• Reported progress to our Senior Management Team and our Council.

Steps to take from August 2018

(A) Risk assessment
We will:
• Review the Equiano action plan with a view to discussing the risks identified with our suppliers

(B) Risk mitigation
We will:
• Act promptly where a compliance breach has been identified or flagged in line with the attached procedure for reporting suspected instances of Modern Slavery.
• Continue to feed-back lessons learnt into risk management process.

(C) Management responsibility and general awareness
We will:
• Improve information available on our website for suppliers to ensure they are aware of our commitment to removing modern slavery from our supply chains
• Continue to raise awareness of this statement through communication both internally and externally.
Procedure for Reporting suspected instances of Modern Slavery – October 2017

Introduction
Modern slavery is real. It is happening here in the UK, in our communities. It is a largely unseen crime, with victims hidden in takeaways, hotels, car washes, nail-bars and private homes as well as factories, farms and brothels.

The Home Office predicts that there may be as many as 13,000 victims in the UK alone. There is no typical victim of slavery. Victims can be men, women and children of all ages and cut across the population, but it is normally more prevalent amongst the most vulnerable, minority or socially excluded groups.

Definitions
• ‘slavery’ - where ownership is exercised over a person
• ‘servitude’ - involves the obligation to provide services imposed by coercion
• ‘forced or compulsory labour’ - involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily
• ‘human trafficking’ - concerns arranging or facilitating the travel of another with a view to exploiting them.

Goldsmiths (the College) accepts that it has a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

Scope
The prevention, detection and reporting of modern slavery in any part of the College’s supply chains, whether in the UK or abroad, is the responsibility of all those working for the College whether directly or indirectly, including employees at all levels, directors, officers, agency workers, agents, contractors, consultants and strategic partners.

Goldsmiths’ Council has overall responsibility for ensuring that this policy complies with the Modern Slavery Act 2015.

Line managers, Heads of Departments and Directors are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance
If you believe you may have come across an instance of modern slavery or if you are unsure about whether a particular act, the treatment of workers or their working conditions within the College’s supply chain constitutes any of the various forms of modern slavery, please raise it with any member of the Procurement Team as soon as possible. If it is not possible to speak to the Procurement team please contact the Government’s Modern Slavery Helpline on 08000 121 700 for further guidance on what to do.

In August 2017 the Modern Slavery Helpline had received 394 calls and a further 127 online reports via its website www.modernslaveryhelpline.org which has resulted in 181 cases of Modern Slavery.

Goldsmiths will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Training and communication
Training will be provided to staff as necessary, to improve awareness and help identify exploitation and modern slavery.

Breach of the procedure
Goldsmiths may terminate its commercial relationship with suppliers if they are found to have knowingly allowed the continuation of any instance of modern slavery in their supply chains where it was in their power to act on this.