



# HARTPURY

## Slavery & Human Trafficking Statement

APPROVAL & REVIEW CYCLE		
Policy Owner/Reviewer	Chief Operating Officer	January 2026
Approved By	SMT	January 2026
	SFR	February 2026
Interim-Review	No	-
Next Review Date		January 2027

## **Introduction**

This statement constitutes Hartpury University and College's slavery and human trafficking statement for the financial year ending 31st July 2024. The University and College are legally required to publish an annual statement by section 54 of the Modern Slavery Act 2015. Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University and College have taken, and will take in the coming year, to address this issue. It covers both our own workforce and how we will address modern slavery in our supply chains.

We have robust recruitment procedures in place to ensure that there is no possibility of slavery in our institution's workforce and we are committed to continuing to use our procurement activities to combat modern slavery in our supply chains.

Hartpury Governors and Management are committed to safeguarding and promoting the wellbeing of all learners by:

- PREVENTION - providing a safe environment for students, young people and adults at risk to learn, study and reside;
- PROTECTION - identifying students, young people and adults at risk who are suffering, or likely to suffer, significant harm and protecting from maltreatment;
- SUPPORT - taking appropriate action to see that such students, young people and adults at risk are kept safe at home, at Hartpury and in the workplace;
- ACTION – taking action to ensure all students, young people and adults at risk have the best outcomes.

This will include any students at risk of modern slavery, trafficking or exploitation

## **Organisational Structure**

Hartpury University is a higher education establishment and as a charity operates on a 'not for profit' basis. The University delivers higher education in support of agricultural, equine, animal, sport and veterinary nursing. Its primary activities are the provision of world class teaching and research. Hartpury College is a designated Further Education Institution and is a company limited guarantee wholly owned by Hartpury University. It offers further education in the following sector areas agricultural, equine, animal, sport and A Levels.

## **Our Recruitment Practices**

We directly employ circa 700 employees and we have a thorough set of employment related policies and procedures that prevent any possibility of modern slavery occurring within our workforce. Our Human Resources (HR) department and recruiting managers follow a recruitment policy and processes which are regularly reviewed for compliance with legislation.

At the time of application, potential employees have to provide 'right to work' information which is checked at interview. The majority of interviews are conducted face-to-face which ensures that individuals have freely chosen to attend. All application forms are verified as

being the applicant's own information, including taking a copy of the interviewee's original passport and any additional 'right to work' documentation (where applicable).

Where interviews are conducted via Teams or other electronic means, the candidate is required to present their original passport and other additional 'right to work' documentation (where applicable) in person to HR before their start date or on their first day. All employees receive a written contract of employment. HR also provide information to all new employees on their statutory rights including sick pay, holiday pay and other benefits they may be entitled to.

Temporary staff and other staff recruited indirectly by the University are only recruited through established and accredited sources who can provide assurance that they fully comply with the requirements of all legislation relating to the rights and welfare of their candidates and employees.

These actions mean that we can be confident in stating that there is no modern slavery in our directly employed workforce.

### **Students**

Although the risks of students experiencing occurrences of modern slavery or human trafficking through direct contact with the University or College are extremely low it is appreciated they may become aware of such instances or on very rare occasions be entrapped into adopting the lifestyle of a modern slave. In order to mitigate these circumstances the University and College has in place easily accessible and well known channels through which students can obtain assistance, support and advice on their wellbeing.

Staff within the Wellbeing Team, as well as Residential Support Team and officers of the Students' Union, will receive training briefings on the issues related to modern slavery, and how students can be supported should they present with related concerns.

### **Our Supply Chains**

The University and College purchases from over 2,000 different suppliers each year. The suppliers who we directly purchase from are known as our 1st tier suppliers. These 1st tier suppliers, in turn, trade with their own supply chains (2nd tier, 3rd tier and so on) to produce and offer the goods, services and works that the University and College require. Our 1st tier suppliers range from locally based micro businesses through to large global companies. Our supply chains mainly fall into the following categories:

- ICT equipment and services
- Estates and Facilities goods and services
- Educational resources suppliers
- Library resources
- Professional Services
- Land based goods and services

Our ICT and Estates departments are responsible for many of our high value contracts with suppliers. ICT requirements include IT systems, hardware and telecoms; Estates have requirements including capital works, facilities management, building maintenance and energy. Our other high value expenditure categories include agricultural equipment and consumables, library materials, food supplies and professional services.

The vast majority of our purchases are from suppliers based in the UK. The Walk Free Foundation (who campaign on modern slavery) have profiled modern slavery risks in the UK, and UK based industrial supply chains are not a common source of modern slavery. Whilst we cannot categorically state that there is no modern slavery in our 1st tier suppliers, we assess the risk of this as being low.

Only a small proportion of the University's purchases are from overseas suppliers. Typically, the overseas suppliers we use operate in high-tech industries in developed countries where the risk of modern slavery is less prevalent.

Suppliers in less developed countries can pose a greater risk of modern slavery. In the last financial year, we used only a minimal number of 1st tier suppliers located in the countries identified by the Walk Free Foundation's 2018 index as having the highest proportion of their population in modern slavery. We assess our exposure to be limited.

We will continue to build upon our existing systems to:

- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers and report unethical conduct.
- Understand our suppliers both nationally and internationally.
- Confirm our suppliers have in place suitable anti-slavery and human trafficking policies and processes and to support our commitment to ethical and sustainable business practices.
- Include modern slavery and human trafficking clauses in our standard terms and conditions.

We continue to keep ourselves aware of the developments taking place in the higher and further education procurement consortia. These are buying groups who aggregate the purchasing power of universities and colleges to improve value for money and increase our ability to influence suppliers. The consortia are an important part of our approach to modern slavery as we use their contracts for many commonly purchased items where modern slavery may be present in the supply chain (e.g. office stationery; IT hardware; laboratory consumables etc.). Effectively the University and College will be delegating its modern slavery supplier due diligence to the consortia for these products. We have seen evidence that the consortia have processes and procedures to tackle modern slavery and are confident that appropriate actions are being taken by them.

In order to identify risks and provide mitigation the University and College provides all suppliers with our standard terms and conditions for goods and services as part of the Purchase Order, reflecting our commitment to addressing Modern Slavery and to ensure suppliers are aware of and seek to comply with Modern Slavery legislation.

Relevant staff within the ICT and Estates departments will receive training briefings on the issues related to modern slavery.

### **Compliance with this policy**

All employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners and academic partners ('You') must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to a breach of this policy.

The Chief Operating Officer is the person with overall responsibility for compliance on behalf of the University and College in relation to tackling Modern Slavery. Any concerns from suppliers, university or college students or staff or any third parties regarding Modern Slavery in relation to the University should be directed to the Chief Operating Officer, in the first instance.

You must notify the Chief Operating Officer and Clerk to the Board of Governors or report in accordance with our Public Interest Disclosure (Whistleblowing) Policy as soon as possible if you believe or suspect that a conflict with this policy is occurring, has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, or, if it is not appropriate to do so, with the Chief Operating Officer and Clerk to the Board of Governors.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains or partner organisations.

## **FREEDOM OF SPEECH**

As part of this policy, Hartpury reaffirms its commitment to the principles of freedom of speech and academic freedom, in accordance with the Higher Education (Freedom of Speech) Act 2023 and guidance from the Office for Students (OfS). Hartpury will take all reasonably practicable steps to secure the right to express lawful views and engage in open debate without fear of censorship or institutional discipline for staff, students, and visiting speakers. In addition, this policy prohibits the use of non-disclosure agreements (NDAs) in any situation that would prevent staff from speaking out about misconduct, harassment, or other matters of public interest.

## **EQUALITY, DIVERSITY AND INCLUSION**

As with all Hartpury policies and procedures, due care has been taken to ensure that this policy is appropriate to all members of staff and students regardless of their age, disability, ethnicity, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and transgender status.

The policy will be applied fairly and consistently whilst upholding Hartpury's commitment to providing equality to all. If any employee or student feels that this or any other policy does not meet this aim, please contact the HR Department (staff) or an academic tutor (student).

Hartpury is committed towards promoting positive mental health by working towards the MINDFUL EMPLOYER Charter, holds the Student Minds University Mental Health accreditation and has signed the AoC Mental Charter. Hartpury aims to create a culture of support within the workplace where employees can talk about mental health problems without the fear of stigma or discrimination.

Signed by

Edward Keene

Mr. Edward Keene

Chairman of the Corporation

On behalf of Hartpury University and Hartpury College.

Date: February 2026