Briefing Paper

The Slavery-Free Campus:

Recommendations for University Action Against Modern Slavery

There are an estimated 40.3 million enslaved people in the world today, but ending slavery is part of the UN Global Goals (target 8.7) agreed by 193 countries in 2015 for delivery by 2030. This report argues that universities have a distinct role to play in contemporary antislavery work, and investigates how universities are both affected by and engaging with the issue of modern slavery. It focuses on UK universities, but gives examples where relevant from the United States. It sets out how universities are sites for both exploitation risk and antislavery action. The report makes specific recommendations for steps that universities can take in the short- and long-term to become slavery-free campuses, in a new three-part Slavery-Free Campus Framework.

Universities as Sites of Exploitation Risk

Universities are directly affected by modern slavery. Under the Modern Slavery Act (MSA) of 2015, a commercial organisation that supplies goods or services with an annual turnover of £36 million in the UK must prepare a slavery and human trafficking statement for each financial year. We analysed 160 UK universities for this report, and found that 74% have produced a Modern Slavery Statement, but that only 34 statements are up to date. We used this analysis to identify three main areas where universities are vulnerable; staff at risk, students at risk, and procurement.

Universities as Sites of Risk Mitigation

Many universities are now responding across the three main areas of risk. 79% of university Modern Slavery Statements (n=34) that we examined covered the topic of vulnerable staff on campus. Yet only 15% of university Modern Slavery Statements (n=34) cover the topic of vulnerable students. University engagement in the area of procurement risk is more robust, and many universities are successfully embedding their MSA response to supply chain risk within existing procurement policy and practice.

Universities as Sites of Antislavery Education and Engagement

Beyond their risk mitigation activities, some universities are taking additional steps and using their specific educational contexts for antislavery innovations in the area of awareness-raising, education, community engagement and research. This includes student societies, which tend to successfully raise awareness and funds, but is sporadic and neither wide-scale nor long-term. A more consistent route to campus community engagement has been via university teaching and research, including research outputs designed to be useful tools for the broader antislavery community.

In the UK, some universities have supported their local modern slavery multi-agency partnerships. Most areas of the UK have some form of multi-agency partnership work in place to address modern

slavery, and some include participation from their local university. For example, the University of Nottingham currently provides the secretariat for the Nottingham and Nottinghamshire Modern Slavery Partnership, and a researcher at the University of Hull serves as the Vice Chair of the Humber Modern Slavery Partnership.

These efforts by universities and colleges in the areas of supporting student groups, developing educational resources and awareness-raising, partnering community organisations including in their local areas, and delivering research to fill evidence gaps, point to the significant potential for universities to be part of antislavery efforts going forward. However, these efforts remain largely piecemeal and dependent on the interests of particular students and educators. We therefore now offer a structured set of recommendations for universities to consider adapting as they build more long-term, institutional responses to the problem of modern slavery.

Universities as Slavery-Free Campuses

We developed these recommendations for a Slavery-Free Campus around an existing "slavery-free cities" framework adopted by the University of Nottingham in 2016. The framework is based on community resilience to modern slavery, across a spectrum from prevention and discovery to sustainable resilience. By adapting this sustainable resilience framework for the university context, we have designed multiple immediate/short-term recommendations for each step plus a long-term recommendation for each step that is designed to encourage universities to be ambitious in their slavery-free campus work. The framework is specific to the UK context, which has reporting requirements in response to the 2015 Modern Slavery Act, but could be adapted for other country contexts.

The Slavery-Free Campus Framework

1. **Prevention**: *creating an environment where slavery cannot flourish.*
a. Short-term:
   i.   A programme of basic-level awareness-raising and training for all staff and students should be implemented across the university. For example, this could form part of staff induction and consist of a brief compulsory online course (e.g. a podbriefing). This serves to raise awareness of the fact that modern slavery exists, and to briefly educate on vulnerabilities. This report identifies several groups of particularly vulnerable staff and specific vulnerabilities that students themselves may face, and these groups and specific issues should be prioritised in awareness-raising and training materials.
   ii.   Universities should ensure that policies are in place to support staff and students who are found to be in situations of exploitation. This may include a robust Whistleblowing Policy where any suspected cases of modern slavery are fully investigated.
   iii. Universities should avoid recruitment via agencies, but where agency recruitment is necessary, universities should use established and reputable recruitment agencies that have been subject to scrutiny in line with the MSA.
   iv.   Universities should actively support the safe migration of students via appropriate advice and monitoring on visas, and of staff via robust HR requirements of proof of the legal right to work in the UK.

b. Long-term:
   i.   Modern slavery should be included in the core syllabus of all front-line degree programmes, for example medicine, midwifery and social work. This increases community resilience to modern slavery when these students graduate and can identify and respond to cases of modern slavery in their places of work.

2. **Discovery**: *responding to any ongoing issues within universities.*
a. Short-term:
   i.   Specific training should be provided for university counselling staff, student tutors, hall wardens, campus security staff, 'nightline' volunteers and any other students or staff members who hold pastoral roles within the university. This ensures that victims who come forward are given appropriate care. This training should be repeated annually.
   ii.   University procurement departments should provide regular, specific training for staff, and conduct regular reviews of their procurement practises. This should include investigation into the supply chains of both the university and the Students' Union.
   iii. Procurement departments should adopt specific policies on conflict minerals and fair trade.
   iv.   Procurement departments should develop prioritised categories for assessment (e.g. electronics, food and catering, laboratory supplies, building supplies).
   v.   Procurement departments should consider membership of groups like Electronics Watch (which works to ensure good working conditions in factories producing Information and Communication Technology goods bought by public sector members across Europe).
   vi.   University finance departments should conduct regular reviews of their investment practises, to ensure their ethical investment or responsible investment policies include modern slavery, and that investments are in line with these policies. Universities should consider being signatories of the United Nations Principles of Responsible Investment, now known as PRI, and therefore integrating environmental, social and governance issues (including human rights issues such as modern slavery) into investment and ownership decisions. University fund managers should also be PRI signatories and share a commitment to assess ESG concerns in university investments.
   vii. University HR departments should ensure correct recruitment procedures are being conducted by contractors and agencies and that all staff are paid the minimum wage with decent working conditions.
   viii. University research services and fundraising departments should ensure that policies on research partnerships and donors include work to ensure the university is not giving or receiving funds from external organisations that do not have risk mitigation in place (in line with the reporting requirements of the Modern Slavery Act).
b. Long-term:
   i.   The results of regular short-term reviews of actions in 2.a should inform the annual, legally-required review and update of each university's Modern Slavery Statement, which should include Key Performance Indicators and year-on-year development of long-term and robust commitments to procurement practises, human resources policies, fundraising, investments, and campus awareness and training.

3. **Sustainable Resilience:** *ensuring that universities maintain their commitment and engagement, evolving their response as slavery itself evolves.*
a. Short-term:

    i.   Universities should support and encourage student antislavery activities by student groups and unions. Where possible, universities should invest in student-led programmes, an example being UoN Against Slavery (2018-19).

    ii.   Universities should establish a specific committee or working-group with responsibility to oversee work against this framework and to adapt to changing circumstances. This may be an existing working group already charged with monitoring activity against the steps laid out in the university's Modern Slavery Statement, but expanded to include additional stakeholders with responsibility for elements of the Slavery-Free Campus Framework.

    iii.   Universities should involve survivor input and leadership in their Slavery-Free Campus work and committee, recognizing the value of the expertise of those with lived experience. The Survivor Alliance (2019a, 2019b) has a network of survivor leaders available for consultancy.

b.   Long-term:

    i.   Universities should participate in and support the work of local antislavery multi-sector partnerships and local prevention programmes. This could include event hosting, support for training materials or website development, support for front-line professionals in training, and monitoring and evaluation services. This civic engagement also feeds into the discovery phase of the framework.

Conclusion

Universities are affected by the issue of modern slavery. They are sites of exploitation risk, and potential sites of antislavery education, partnership and research. University engagement with the issue of modern slavery remains sporadic and piecemeal, but universities have the potential to be more fully involved in antislavery efforts, locally, nationally and internationally.

Our Slavery-Free Campus Framework suggests ways that universities can mobilise their resources and specific contexts as educational communities, employers, buyers, investors, and civic partners. Each university should tailor this framework to their specific contexts and priorities. No two universities are the same, and no two campus plans to become slavery-free will look the same. Slavery is a dynamic problem, and so universities should also conduct an annual review and reappraisal of their Slavery-Free Campus Framework in order to update it for changing circumstances and emerging issues.

As we approach the fifth anniversary of the Modern Slavery Act's Royal Assent and passage into law (March 26, 2015), it is time for all universities to move beyond minimum compliance with the reporting requirements of the Modern Slavery Act, and become leaders in the work of tackling and ending modern slavery.

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Bibliography

Bales, K. (2016) *Blood and Earth: Modern Slavery, Ecocide, and the Secret to Saving the World*, New York: Spiegel & Grau.

Bowman, V. (2019, 4 November) 'Gangs targeting private schools to traffic Vietnamese girls to Britain, it is revealed', *The Telegraph*.

Cottone, A. and Gardner, A. (2019) 'Evaluation of the Labour Exploitation, Education and Awareness Project delivered by the Gangmasters and Labour Abuse Authority and Boston College'.

Day, S. (2010) 'The re-emergence of "trafficking": sex work between slavery and freedom', *Journal of the Royal Anthropological Institute*, 16(4): .816-834.

Dewey, S. (2008) *Hoolow bodies: institutional responses to sex trafficking in Armenia, Bosnia, and India*, Sterling: Kumarian Press.

Electronics Watch (2019) 'Vision and Mission'.

Emberson, C. (2017) 'Modern Slavery Act Statements in the University Sector – The Start of the Journey'.

French, S. (2018) 'Between globalisation and Brexit: Migration, pay and the road to modern slavery in the UK hospitality industry', *Hospitality Management*, 8(1): .23-32.

Fyfe, W. (2019, 16 September) 'County lines: Drug dealers "pretend to be uni students"', *BBC News*.

Gangmasters and Labour Abuse Authority (2019) 'Construction Industry: Headline Trends'.

Gonçalves, M., Monteiro, I., and Matos, M. (2019) 'Trafficking in Human Beings: Knowledge of Portuguese College Students', *Journal of Human Trafficking*.

Lehmann, W. (2013) 'Extra-credential experiences and social closure: Working-class students at university', *British Educational Research Journal*, 38(2): 203-218.

Martin-Ortega, O. (2017) 'Human Rights Risks in Global Supply Chains: Applying the UK Modern Slavery Act to the Public Sector', *Global Policy*, 8(4): 512-521.

Modern Slavery Act (2015).

National Crime Agency (2019) 'County Lines Drug Supply, Vulnerability and Harm'.

Parker, T. S. (2017) 'Human Trafficking and Study Abroad', *Laws*, 6(3), pp.14-26.

Polaris (2017) 'Human Trafficking on Temporary Work Visas: A Data Analysis 2015 – 2017'.

Roberts, R., Jones, A. and Sanders, T. (2013) 'Students and sex work in the UK: providers and purchasers', *Sex Education*, 13(3): 349-363.

Simpson, J. (2019, 17 September) 'County lines drug gangs pose as students', *The Times*.

Stubley, P. (2018, 2 November) 'University lecturer arrested "for keeping builder as a slave in garden shed for four years"', *The Independent*.

Survivor Alliance (2019a) 'Survivor Alliance: Homepage.'

Survivor Alliance (2019b) 'Dear Allies.'

UK Independent Anti-Slavery Commissioner and the Rights Lab (2018) 'Modern Slavery Research: the UK Picture.'

University of Nottingham Students' Union (2019) '6. Modern Slavery Policy.'

Yee, E., Yee, I., Lee, L. M., and Chow, S. (2019) 'Inside the Student Trafficking Trade.'