Introduction from the Chief Executive, Nigel Portwood

The Modern Slavery Act 2015 drew attention to the international problems of modern slavery and human trafficking, and since its enactment these problems have been the focus of increased public scrutiny and concern. We welcome this development. Oxford University Press is committed to conducting its business to the highest standards of integrity and we have a zero tolerance approach to modern slavery and human trafficking.

Nigel Portwood
Chief Executive
Oxford University Press       Date: 18 July 2018

Our structure

Oxford University Press ('the Press') is a department of the University of Oxford ('the University'). The University, which is a civil corporation established under common law, is an exempt charity under the Charities Act 2011.

We have a distinct governance structure which is written into the statutes of the University. Our work and activities are overseen by a Delegacy appointed from the academic staff of the University and chaired by the University’s Vice-Chancellor. The Delegates appoint a Finance Committee, which consists of certain Delegates, the Chief Executive of the Press, and other senior colleagues, as well as external members. The Finance Committee is responsible for directing and managing the business of the Press, and it acts in much the same way as the board of directors of a company. This statement has been approved by Finance Committee and the Press’s Executive Committee (our senior executive management body).

We are the largest university press in the world, with offices in more than 50 countries and over 6,000 employees. We also have a number of subsidiaries across the world. This statement refers to the activities of the Press globally. Further information about us and our mission can be found here.

Our activities

As a department of the University, we further the University’s objective of excellence in research, scholarship and education by publishing worldwide. We publish thousands of diverse titles each year globally, in more than 90 languages and in both print and digital formats.

Our products span the academic and educational spectrum, to support all audiences – from pre-school to secondary level schoolchildren; students to academics; general readers to researchers; individuals to institutions. Our range includes dictionaries, English language teaching materials, children's books, journals, scholarly monographs, music, higher education textbooks, and schoolbooks. Everything we publish has to adhere to our high-quality standards, as well as supporting our aims of furthering education and disseminating knowledge. Many titles are created specifically for local markets and are published by regional businesses.

Supply chain summary

Our supply chain continues to include the following principal activities:

- Production of printed materials, and ancillary items
- Freight
- Warehousing
- Digital platform development and hosting
- Procurement of goods and services not directly related to the production of print and digital products.
We procure goods and services from suppliers across the world. We deliver products to 219 countries and territories around the world, and we have 33 warehouses in 19 countries.

Policies

Code of Conduct

We introduced a Code of Conduct in 2012 as a guide to support our employees in working in a manner that is consistent with our values, and in making good decisions every day. The principles in the Code of Conduct are informed by our mission and underpinned by other policies. The Code of Conduct is available in 18 languages and every year we ask each employee to acknowledge that they have read and understood it. The Code of Conduct includes the following statement:

We support universal human rights including equal employment rights, safe workplaces, freedom of speech and of association, and the rights of all to an education.

We oppose illegal or inhumane labour practices and expect our suppliers and other partners to do the same. We will take steps to ensure that there is no slavery or human trafficking in our business or its supply chain.

A copy of our Code of Conduct for 2018/19 can be found here.

Partner Code of Conduct

The Partner Code of Conduct is a version of the Code of Conduct, specifically developed for our business partners. It was created in 2013 to give our partners a clear view of the values and principles that underpin our work. A copy of the Partner Code of Conduct is made available to all business partners, and we expect them to act in accordance with the Partner Code of Conduct at all times.

A new edition of the Partner Code of Conduct was issued in October 2017 to include a new section on anti-slavery and human trafficking. It now includes the following provisions:

We oppose illegal or inhumane labour practices, including the use of forced or child labour. We take steps to ensure that employment is freely chosen, and that there is no slavery or human trafficking in our business or its supply chain, and we expect our business partners to do the same. We oppose harsh or inhumane treatment of workers.

A copy of our current Partner Code of Conduct can be found here.

Raising Ethical Concerns policy

We have eight policies in place to ensure our employees uphold our ethical standards. We require all employees to review and accept these policies annually.

One of these policies is our Raising Ethical Concerns Policy, which outlines the procedures that staff should adopt if they suspect unethical behaviour. The most recent version of the Raising Ethical Concerns Policy was issued in January 2017, and includes specific reference to ethical concerns relating to illegal and inhumane labour practices such as slavery and human trafficking.

Employment policies

We carry out appropriate vetting checks when we recruit new employees to ensure their employment complies with relevant laws and to establish, so far as possible, that they meet our ethical standards. During the financial year 2017/18, we started to implement a Global Recruitment Policy and a global recruitment system to support the fair recruitment and selection of employees. Our Global Human Resources function works with our local management teams to ensure that pay and conditions are appropriately managed, and a Global Reward Team monitors pay and benefits against market conditions.
**Training and communications**

We provided anti-modern slavery and human trafficking awareness presentations and updates to key internal stakeholders during the financial year 2017/18. Those trained included central and divisional procurement specialists, and senior managers in the Operations, Supply Chain, Change Management, and Group Compliance functions.

We are planning to introduce the following additional learning and development sessions in 2018/19:

- Anti-modern slavery content will be added to the current ethical online training module, which all OUP employees and contractors are required to undertake at the start of their employment and annually thereafter.
- Face-to-face sessions will be provided to local compliance, procurement, and operations teams to ensure they are equipped to support our efforts to identify and address any issues of modern slavery in our operations or supply chain.

**Risk assessment and key risks**

Our evaluation of key modern slavery and human trafficking risks within our supply chain has indicated that the following types of supplier activity continue to present a potentially high risk:

- Production of printed materials, including paper supply;
- Production of items ancillary to the production of printed materials including, in particular, toys and textiles accompanying certain educational resources;
- Digital editing and typesetting; and
- Supply of electronic devices to the Press.

We select our business partners with great care. In the financial year 2017/18, a risk assessment tool was developed to help us to identify suppliers within our supply chain who could potentially pose a greater risk of modern slavery or human trafficking. The tool takes into account the following criteria:

- Country risk;
- Product or services risk; and
- Annual expenditure with the supplier.

As a result of this risk assessment, we have been able to prioritize a number of suppliers (‘Priority 1 suppliers’) for detailed due diligence on the specific risks of modern slavery.

**Due diligence and contracting**

We issue a questionnaire to prospective business partners assessed as posing a potentially higher risk from an ethical perspective. The responses to the questionnaire enable us to assess whether a potential new business partner is likely to work in a manner consistent with our Partner Code of Conduct. It also helps us to understand what further due diligence may be required.

During the financial year 2017/18, we expanded the questionnaire for Priority 1 suppliers to include questions relating directly to modern slavery and human trafficking. These questions are intended to help us to understand:

- The processes such suppliers have in place to ensure human trafficking and slavery do not exist in their supply chains, including whether they conduct independent audits of their operations and suppliers.
- Whether they use prison labour in their operations and/or in their supply chains.
- The steps they have in place to ensure their employees are trained to understand the risks and ethical concerns around slavery and human trafficking.
- Any programmes they have in place to remediate staff misconduct related to modern slavery and human trafficking.

We sent the amended questionnaire to a number of Priority 1 suppliers whose activities fell into one or more of the following categories: print, paper, binding, and content creation. Following receipt of their responses, we conducted extensive due diligence (including searches of public databases).

Two of the suppliers were selected for modern slavery and human trafficking audits. The audits were conducted by three senior managers, one each from Group Procurement, Health and Safety, and Compliance. Each supplier visit included inspections of the suppliers’ premises, including as appropriate their warehouses, offices, and printing works. We also provided training to their management teams. No
modern slavery or human trafficking concerns were identified, and each supplier had some awareness of the issues surrounding modern slavery and human trafficking, with policies on recruitment and remuneration in place.

However, the audit established that one of the suppliers had no processes in place to prevent modern slavery and human trafficking in its supply chain. This matter was discussed with the company’s management and it was agreed that training should be provided to its Board of Directors, which would then develop an appropriate anti-modern slavery and human trafficking programme to cover its supply chain. We are supporting this initiative by providing the company with training materials, and by continuing to assist and advise the supplier as it creates its own anti-modern slavery and human trafficking programme. The audit team also made a number of other recommendations regarding improvements to the processes and procedures of both suppliers.

Where appropriate, we continue to negotiate contractual clauses into our agreements with suppliers to address the risk of slavery and human trafficking.

We will conduct further modern slavery and human trafficking risk assessments and due diligence during the financial year 2018/19 on existing and new suppliers. Additional modern slavery audits of higher risk suppliers will be undertaken. As and when we identify any concerns, we will endeavour to work with our suppliers to ensure they remediate issues and develop an anti-modern slavery and human trafficking programme in their own organization and supply chain.