Slavery & Human Trafficking Statement

For the financial year ended 31 March 2019 (made in accordance with section 54 of the Modern Slavery Act 2015)
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 do not tolerate modern slavery and human trafficking.

Nigel Portwood, Chief Executive, OUP

Our structure

Oxford University Press (‘the Press’) is a department of the University of Oxford (‘the University’). 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 at: http://global.oup.com/about/?cc=gb

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 product range includes dictionaries, English language teaching materials, children’s books, journals, scholarly monographs, music, higher education textbooks, and schoolbooks.
Supply chain summary

Our supply chain includes the following principal activities:

We sell to customers globally and procure goods and services from suppliers across the world.

We operate 24 warehouses across 20 countries, which are a combination of OUP-managed sites and sites managed by Third Party Logistics providers.

Policies

**Our Code of Conduct** is a guide to support our employees in working in a manner that is consistent with our values, and in making good decisions every day. It states that we oppose illegal or inhumane labour practices, expecting our suppliers and other partners to do the same, and that 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 current Partner Code of Conduct can be found [here](#).

**Our Raising Ethical Concerns policy** outlines the procedures that staff should adopt if they suspect unethical behaviour. It includes specific reference to ethical concerns relating to illegal and inhumane labour practices, such as slavery and human trafficking.

**Our Employment Policies** require that appropriate vetting checks are carried out 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. Our Global Human Resources function ensures that pay and conditions are appropriately managed, and monitors pay and benefits against market conditions.
Training and communications

We deliver comprehensive anti-modern slavery and human trafficking presentations to key internal stakeholders including central and divisional procurement specialists, and senior managers in our Operations and Supply Chain teams. This ensures that they are equipped to support our efforts to identify and address any issues of modern slavery. In early 2019 anti-modern slavery content was added to our online ethical training module which all OUP employees and contractors are required to undertake annually.

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 higher risk:

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

We select our suppliers with great care. During the 2018/19 financial year, we implemented a risk assessment tool developed specifically to help identify modern slavery risks, taking into account country risk, product/service risk, and annual expenditure. This identified a small number of suppliers which pose a greater risk of modern slavery or human trafficking.
Due diligence and contracting

We issue a questionnaire to prospective suppliers identified by the above process to assess whether they are likely to work in a manner consistent with our Partner Code of Conduct, and what further due diligence may be required. It includes questions relating directly to modern slavery and human trafficking to help us understand:

- The processes these suppliers have in place to ensure human trafficking and slavery does 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.

Following receipt of their responses, we conduct extensive due diligence including searches of public databases. In 2018 and early 2019 we carried out 13 modern slavery audits of suppliers based in India, China, Malaysia, Turkey, Spain, and the UK. These were intended to confirm that no modern slavery is present in their businesses and to understand how they are managing and mitigating modern slavery risks within their operations and supply chains. No specific modern slavery or human trafficking concerns were identified, but we have made a number of recommendations related to their people and supplier management practices.

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

Monitoring and Review

We have developed appropriate Key Performance Indicators (KPIs), which will be included in annual Group reporting. These KPIs, which will be implemented later in 2019, will measure:

- The number of suppliers we have assessed as posing a higher modern slavery risk.
- How many of these suppliers have been the subject of additional due diligence.
- The number of modern slavery audits conducted on such suppliers during the year.

Following the completion of due diligence and any supplier audits, we will also be measuring the number of higher risk suppliers which we have agreed to work with, the number we have rejected as business partners, and the number of higher risk suppliers we have agreed to work with only if they implement additional anti-modern slavery measures to address our concerns.

We have also enhanced our monitoring and review programme to include checks across our organisation on how well our anti-modern slavery controls have been implemented in practice.

This statement has been approved by the Press’s Finance Committee and the Press’s Executive Committee.

Nigel Portwood
Chief Executive
Oxford University Press
Date: 2 July 2019