Modern Slavery and Human Trafficking Statement

Financial year ended 31 July 2026

9th September 2026

This statement describes the steps taken by the University of Oxford during 2025/26 to identify and address modern slavery risks in its operations and supply chains.

Prepared pursuant to section 54 of the Modern Slavery Act 2015.

1.Scope, structure and supply chains

This statement is made under section 54(1) of the Modern Slavery Act 2015. It covers 1 August 2025 to 31 July 2026 and has been prepared with regard to the Home Office Transparency in Supply Chains guidance, focusing on its Level 1 disclosures.

The University of Oxford is a civil corporation and an exempt charity. It comprises academic divisions, departments and faculties, research centres, professional services, libraries, museums and collections, together with controlled entities. Its core activities are education, research and innovation for public benefit. Using the latest figures available for this draft, the University employed approximately 16,000 people from more than 120 countries; around 0.7% of permanent employees were based outside the UK; and its Temporary Staffing Service supported an average of about 300 temporary workers at any one time.

The University buys goods and services for teaching, research, innovation, estates and day-to-day operations. Main categories include scientific equipment and consumables; professional and temporary staffing; construction, facilities management and maintenance; IT hardware, telecommunications and software; travel; books; food; clothing; merchandise; and office supplies. Suppliers range from local small businesses to multinational organisations with complex global production and labour chains. Visibility is strongest for direct suppliers and centrally managed contracts and is more limited below tier 1, for spot purchases and for decentralised activity. Improving this visibility remains a priority.

Prepared with input from Purchasing, Human Resources, Risk, Compliance and Assurance, and relevant specialist teams.

Entities covered

This statement covers the University and those subsidiaries which meet the threshold requiring a statement in their own right.

The chartered colleges and permanent private halls are separate, self-governing legal entities and are not covered unless expressly named. Oxford University Press is a department of the University but publishes a separate statement because it has a different financial year-end and a distinct international operating and supply-chain profile.

2. Governance and policies

The General Purposes Committee of Council, or another formally delegated equivalent body, provides senior approval of the annual statement. The People Committee oversees the Anti-slavery and anti-trafficking policy. Risk, Compliance and Assurance coordinates the overall response, while Purchasing, Human Resources and other specialist functions are responsible for controls in their areas.

The Anti-slavery and anti-trafficking policy applies to employees, workers, consultants, contractors, direct suppliers and specified controlled entities. It sets expectations for proportionate due diligence, training, awareness, reporting and action when the policy is breached. The policy approved on 9 June 2022 remained in force during 2025/26. Within this policy, the University also considers child labour, unsafe working conditions and excessive working hours.

Other relevant controls include:

- The Public Interest Disclosure (whistleblowing) Code of Practice;
- **Employment controls:** recruitment, right-to-work, reward, equality and wellbeing policies and guidance, including the University's Living Wage and Oxford Living Wage commitments;
- **Procurement controls:** tender documents, supplier due diligence and standard conditions of purchase; and
- **Other frameworks:** research integrity, ethical research partnership, safeguarding, investment and income controls where relevant to the activity.

These requirements are communicated through policies, staff guidance and e-learning, procurement processes, tender documents and contracts. The University's approach is risk-based and supports prevention, protection from retaliation and access to remedy, reflecting the principles in the UN Guiding Principles on Business and Human Rights and OECD Due Diligence Guidance.

3. Risk assessment and priority risks

The University regularly reviews its risk profile as it relates to modern slavery and human trafficking, with core overarching areas of risk identified related to employment and procurement activities.

The highest-priority areas identified for attention included:

- **Premises, construction, Facilities, Scientific and Medical Equipment & supplies and Raw materials and workshop**

4. Due diligence and action during 2025/26

For centrally managed procurement, contracts above £125,000 excluding VAT require a supplier due diligence questionnaire, this questionnaire includes a potential ground for rejection relating to convictions under Modern Slavery Act 2015 and asks that the supplier confirm they comply with and have written policies and staff training in place in respect of, s54 of the Modern Slavery Act.; departments are recommended to use it for contracts between £25,000 and £125,000; and a shorter checklist is available for lower-value purchases. The review considers the goods or services, sourcing location and other risk indicators. Higher-risk matters may lead to further questions, evidence checks, supplier engagement, contractual controls, action plans or monitoring.

During 2025/26 the University:

- **launched a modern slavery purchasing toolkit in May 2026 -** The toolkit equips procurement staff with guidance on assessing modern slavery risks, identifying high-risk sectors and supply chain characteristics, conducting enhanced due diligence where appropriate, and responding to potential

concerns. It is supported by staff training, supplier engagement measures and strengthened contractual requirements designed to encourage continuous improvement within the University's supply chains'
- **enhanced its supplier due-diligence questionnaire** to obtain more relevant information from third parties; and
- **updated relevant contractual terms** to strengthen supplier obligations and audit rights.

The University also completes lawful pre-employment and right-to-work checks. Original identity documents are inspected where required, copied for the record and returned. Guidance covers the employment of people under 18. The Temporary Staffing Service follows University processes, while preferred external agencies are subject to procurement due diligence and monitoring. The University is an accredited Living Wage and Oxford Living Wage employer, with the commitments extended to relevant contractor and subcontractor staff within the applicable accreditation rules.

5. Raising concerns, incidents and remediation

Staff, students, suppliers, supplier workers and members of the public are encouraged to raise concerns promptly with a line manager or relevant University contact, by email to compliance@admin.ox.ac.uk, or through the Public Interest Disclosure Code of Practice. The University takes reasonable steps to protect confidentiality and does not tolerate retaliation against anyone who raises a genuine concern in good faith.

If someone is in immediate danger in the UK, call 999. Non-emergency concerns may be reported to the police on 101 or to the independent Modern Slavery & Exploitation Helpline on 08000 121 700. A potential victim should not be confronted or put at further risk.

Concerns are triaged according to urgency, safeguarding needs and the University's connection to the issue. The response may include specialist advice, referral to relevant authorities, repayment of fees or withheld wages, correction of employment practices, supplier action plans, monitoring, disciplinary or contractual action and responsible disengagement. The needs and wishes of affected people are considered wherever it is safe and lawful to do so.

No confirmed incident of modern slavery or human trafficking was identified or reported within the scope of this statement during 2025/26. A supply-chain concern raised near the end of the previous reporting period was reviewed and was not found to involve modern slavery. The review nevertheless identified improvements to due diligence, which informed the toolkit, questionnaire and contractual changes described above. The absence of confirmed cases is not treated as evidence that risk is absent.

6. Training, effectiveness and next steps

Modern slavery awareness is available through the University's e-learning course, A Guide to Modern Slavery. Purchasing staff receive training on supplier review tools and sector risk, and managers have access to recruitment and selection guidance. Priority audiences include Purchasing and contract managers, Human Resources, Estates, research and partnership teams, student-facing staff, Legal Services, Risk, Compliance and Assurance, and relevant controlled entities.

The clearest evidence of improvement during the year was the conversion of learning from a supply-chain review into revised due-diligence guidance, questions and contractual protection. In 2026/27, the University will strengthen its use of outcome-focused data through the following minimum measures:

Priority	2026/27 measure	Lead function
Risk visibility and wider relationships	Complete or refresh the risk assessment; record high-risk categories, suppliers and material information gaps; pilot proportionate screening for higher-risk research and other material relationships.	Risk, Compliance and Assurance / Purchasing / relevant specialists
Due diligence, concerns and remedy	Record enhanced reviews, escalations, decisions, contractual controls, concerns, outcomes and corrective or remedial actions through to closure.	Purchasing / Risk, Compliance and Assurance / specialist functions
Training	Report completion by priority audience and test whether participants understand warning signs and reporting routes.	Risk, Compliance and Assurance / HR / Purchasing

7. Approval and signature

This statement was approved by the General Purposes Committee of Council / Council on 19 October 2026 and signed for and on behalf of the University of Oxford.

Vice-Chancellor, University of Oxford

Signature date: 19/10/26