

Anti-Slavery and Human Trafficking Statement

Made in accordance with section 54 of the Modern Slavery Act 2015, for the financial year from 1 August 2022 to 31 July 2023.



CAMBRIDGE
UNIVERSITY PRESS & ASSESSMENT



Introduction from Chief Executive Peter Phillips

Cambridge University Press & Assessment is committed to acting ethically and with integrity, and does not tolerate any form of modern slavery or human trafficking. As part of our commitment, we uphold the standards set out in the Modern Slavery Act 2015 by implementing systems and controls to ensure that modern slavery is not taking place anywhere within our organisation, or in any of our supply chains. This statement is made in accordance with section 54 of the Modern Slavery Act 2015, summarises our current approach and sets out the further action we plan to take in the coming year in our business and our supply chains.

A handwritten signature in black ink that reads "Peter Phillips". The signature is written in a cursive, slightly stylized font.

Peter Phillips, Chief Executive

Our structure

We help millions of people worldwide unlock their potential. Our qualifications, assessments, learning and educational materials, academic publications and original research spread knowledge, spark curiosity and aid understanding around the world. We exist to further the mission of the University of Cambridge: to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence.

We became Cambridge University Press & Assessment on 1 August 2021, bringing Cambridge Assessment and Cambridge University Press together as one organisation. Our two founding organisations have a long-entwined history, from a starting point in December 1858 when the Press first printed exam papers for Cambridge Assessment to today's world-spanning collaboration supporting the future of teaching, learning, assessment, and research.

As Cambridge University Press & Assessment, we span support for the future of teaching, learning, assessment, and research globally. Our global team is made up of 6550 people in 47 locations around the world; 3516 of whom are based in our Cambridge campus in the United Kingdom; 638 in our wider UK offices and operational facilities and 2396 colleagues internationally. To find out more about what we do and our mission statement, please visit

www.cambridge.org/what-we-do

Our policies on slavery and human trafficking

We are committed to carrying out our business sustainably, lawfully, ethically and with integrity – no matter where in the world we operate. This philosophy of fairness and integrity runs through everything we do, and as an active UN Global Compact participant, we are committed to the delivery of our goals in alignment with the ten compact principles on human rights, environment, labour and anti-corruption. We integrate our values of responsibility, collaboration, innovation and empowerment in the way we work together, both in teams and as individuals. We have a number of policies in place to further our commitment to combat modern slavery and human trafficking. This includes:

- Our **Anti-Slavery and Human Trafficking Policy** which outlines our zero-tolerance to all modern forms of slavery and human trafficking, and reflects our commitment to acting ethically and with integrity in all of our business relationships.
- Our **Code of Ethics**, which is updated annually, provides guidance on the standards of behaviour to which all our employees must adhere. The Code of Ethics reflects our commitment to implement systems and controls that ensure modern slavery is not taking place anywhere within our organisation or in any of our supply chains. It also states our requirement for relevant third

parties to hold themselves and their own relevant suppliers to the same high standards. Cambridge employees are required to certify that they have read and understood the Code of Ethics on an annual basis.

- Our **Third Party Code of Conduct** outlines the minimum standard of behaviour we expect from all our third parties (including agents, assessment specialists, contractors, distributors, joint venture partners, and suppliers), and is [available online](#) as well as being provided to third parties prior to conducting business with them. The Third Party Code of Conduct strictly prohibits the use of modern slavery and human trafficking and reconfirms our Code of Ethics requirement for relevant third parties to hold themselves and their own relevant suppliers to the same high standards.
- Our **Speak Up Policy** outlines our commitment to making it possible for employees with serious concerns regarding any aspect of their work, the conduct of others or the running of our organisation to report such concerns in confidence and with confidence. It includes specific reference to concerns relating to modern slavery and human trafficking.
- Our **Speak Up Portal** builds further on the commitment contained within the Speak Up Policy by providing not only our employees, but our authors, assessment specialists, customers and other third parties with a clear procedure for addressing any concerns, including those relating to modern slavery and human trafficking.

- Our **Global Procurement Policy** is designed to work with our supply partners and their extended supply chains to minimise negative impacts from trading activities on the environment and local communities. To further the commitments made within the Global Procurement Policy, we have signed up to the most widely recognised industry standards for labour conditions, environmental impact and chemical safety. We also recognise the importance of the United Nations Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights.

Our supply chain

Our product supply chains are extensive and global, with suppliers in over 80 countries. We currently operate 14 warehouses worldwide, which are managed either directly by Cambridge or by third party logistics providers. The principal activities included in our supply chain are as follows:

- Distribution
- Procurement of goods and services related to production of printed learning and educational materials
- Procurement of goods and services related to the production of printed assessment materials
- Procurement of goods and services not related to the production of learning and educational materials and/or assessment materials
- Production of items ancillary to the production of printed materials including, in particular, toys and textiles accompanying certain

educational resources

- Production of digital materials and platforms
- Production of printed materials
- Warehousing

Assessment of modern slavery risk within our supply chain

In 2016 Cambridge University Press completed a detailed analysis of the global third party community which was made up of many thousands of suppliers and distributors. A similar analysis of the global third party community that supports our newly merged organisation is in progress. This financial year we have continued to map our supply chain to better understand areas of risk for modern slavery. We aim to ensure our top 40 suppliers globally are audited to the SMETA standard using the Sedex mapping tool (described further below). Data on where child labour, modern slavery, human rights and working hours violations are at risk of occurring now directly contribute to how we source, negotiate, and contract our suppliers.

Due diligence processes

We have a comprehensive due diligence programme designed to help us understand whether there is evidence of modern slavery and human trafficking within our supply chain; part of this programme also includes ensuring there are sufficient controls

in place to prevent it. The steps we currently take to assess modern slavery risk are completed as part of our third party due diligence process. All new third party relationships and any existing third party relationships being reviewed, are subject to the following:

- Questioning around compliance with international labour law to include specific questions about modern forms of slavery and trafficked labour to help us understand:
 - The processes our third parties have in place to ensure modern slavery and human trafficking does not exist both within their own operations as well as in their supply chain
 - Whether they have training programmes in place to ensure their employees are trained to understand ethical concerns and risks in relation to modern slavery and human trafficking
 - Whether they have discovered instances of modern slavery or human trafficking within their own organisation, or their supply chain, and if so, what steps they have taken to ensure the concerns were addressed
- Contractual terms to include anti-modern slavery provisions
- Signing up to our Third Party Code of Conduct thereby requiring them to agree to act in accordance with it, including the modern slavery provisions

As an active participant in the Book Chain Project (BCP), a collaborative effort in the publishing industry to promote a responsible supply

chain, we have access to additional information that we use in our due diligence review processes. The BCP consists of 3 modules; Forest Sourcing, Chemicals and Materials, and Labour and Environment. The Labour and Environment module allows us to ensure that our suppliers who have signed up, meet recognised standards for labour and environmental practice. Engaging with the BCP allows suppliers to share their audit findings with multiple publishers easily; we regularly monitor information uploaded into the Labour and Environment database to ensure any new information is reviewed and acted upon where necessary. Additionally we are a member of Sedex. Sedex is a membership organisation that provides an online platform for businesses to manage and improve working conditions within global supply chains. By utilising the platform, we further enhance our ability to source responsibly by effectively mapping our supply chain, and gaining access to ethical and social performance audits (Sedex Members Ethical Trade Audits (SMETA)) and metrics that guide our decision making.

Recruitment

We have robust recruitment and onboarding tools to ensure our values and expectations are reflected in the recruitment of candidates. Vetting and country appropriate checks are then conducted prior to candidates starting.

Training

To raise awareness of modern slavery and human trafficking risks in our supply chain and our business we

provide training to our employees. Our anti-trafficked labour training programme combines online training for all employees, with face-to-face training for those in senior or front-line roles, such as procurement specialists, and members of staff within Operations and Supply Chain. Our online training course helps to ensure that all employees are aware of our regulatory obligations, and are able to identify any issues in regards to modern slavery and human trafficking and raise them appropriately so that any concerns can be addressed.

All new employees are required to complete the online anti-trafficked labour training course within 1 month of starting work, as part of their onboarding process. This process also includes annually certifying that they agree to abide by the Code of Ethics and provides employees with information in regards to how they can ask questions and raise any concerns.

Measuring effectiveness – key performance indicators

Cambridge University Press & Assessment has committed to review its Anti-Slavery and Human Trafficking Policy annually and more frequently if circumstances require it. To help measure compliance and the effectiveness of the policy and, through that, our progress in preventing modern slavery and human trafficking from taking place in our business and supply chains, we use a number of key performance indicators (KPIs) to monitor the numbers of:

- Employees signed up to or re-signed up to our Code of Ethics
- Employees and third parties who have completed training
- Risk assessments of third parties carried out
- Due diligence processes completed
- Audit processes completed
- Partnerships entered into with relevant organisations such as BCP and Sedex

We consider whether these KPIs are still appropriate as part of our annual review of the policy.

Declaration

This statement is made by Cambridge University Press & Assessment, a Department of the University of Cambridge, and has been approved by the organisation's Executive Board. It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 August 2022 to 31 July 2023.



Peter Phillips, Chief Executive



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