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# "Addressing modern slavery: an analysis of UK Universities' disclosure"

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#### List of abbreviations

CEO - Chief Executive Officer

CFO - Chief Financial Officer

CSR - Corporate Social Responsibility

ETI - Ethical Trading Initiative

GRI: Global Reporting Initiative

ILO - International Labor Organization

**KPIs - Key Performance Indicators** 

MSA - Modern Slavery Act

MS Act - Modern Slavery Act

NGOs - Non-Governmental Organizations

SDGs - Sustainable Development Goals

SEDEX - Supplier Ethical Data Exchange

TISC - Transparency in Supply Chains

UK - United Kingdom

UK MSA 2015 - UK Modern Slavery Act 2015

#### **Abstract**

Diese Studie befasst sich mit dem Thema der modernen Sklaverei und untersucht den Einfluss des UK Modern Slavery Act 2015 auf die Modern Slavery-Berichterstattung von britischen Universitäten. In der Literatur gibt es noch begrenzte Studien zur Qualität und zum Umfang der von britischen Universitäten gemäß dem Gesetz erstellten Berichte. Das "UK Modern Slavery Act" bietet allgemeine Leitlinien für die Erstellung von dieser Berichtsen, scheint jedoch unzureichend, um Universitäten und andere Organisationen bei der Verbesserung ihrer Berichten zur modernen Sklaverei zu unterstützen.

Die laufende Debatte über freiwillige versus verpflichtende Berichterstattung wird ebenfalls diskutiert. Einige argumentieren, dass präzisere Vorschriften die Genauigkeit, Qualität und Menge der veröffentlichten Informationen verbessern können, während andere behaupten, dass solche Vorschriften nicht zwangsläufig zu besseren und umfassenderen Berichten führen.

Die Forschungsdesign und -methodik umfassen eine manuelle Inhaltsanalyse und einen Index-Ansatz. Untersucht wurden 141 britische staatliche Universitäten. Die Ergebnisse zeigen eine hohe Übereinstimmung mit den Mindestanforderungen des "UK Modern Slavery Act 2015". Es scheint jedoch notwendig, die Berichterstattung der Universitäten in Bezug auf Umfang und Qualität zu verbessern, da einige Berichte nur allgemeine Informationen ausweisen.

Durch die Verbesserung der Berichtspraktiken können Transparenz, Rechenschaftspflicht und ein proaktives Engagement bei der Bekämpfung von Risiken der modernen Sklaverei in den Betriebsabläufen und Lieferketten der Universitäten gefördert werden. Spezifische Richtlinien, klarere Messmethoden und eine erhöhte Zusammenarbeit mit externen Interessengruppen können dazu beitragen, diese Ziele zu erreichen.

Die Forschung liefert wertvolle Erkenntnisse zum aktuellen Stand der Berichterstattung über moderne Sklaverei und ruft zu weiterer Forschung und Maßnahmen zur wirksamen Bekämpfung dieses dringenden Problems auf.

#### **Abstract**

This study addresses the topic of modern slavery, examining the impact of the UK Modern Slavery Act 2015 on modern slavery reporting by British universities. Existing literature has limited studies on the quality and scope of reports produced by British universities in compliance with this Act. The UK Modern Slavery Act provides general guidelines for the creation of these reports; however, it appears insufficient in assisting universities and other organizations in enhancing their modern slavery reporting.

The ongoing debate regarding voluntary versus mandatory reporting is also discussed. Some argue that more precise regulations can enhance the accuracy, quality, and quantity of the published information, whereas others contend that such regulations do not necessarily lead to better and more comprehensive reports.

The research design and methodology include a manual content analysis and an index approach. A total of 141 British public universities were investigated. Results indicate a high degree of alignment with the minimum requirements of the UK Modern Slavery Act 2015. However, there seems to be a need to improve the universities' reporting in terms of scope and quality, as some reports provide only generic information.

Improving reporting practices can promote transparency, accountability, and proactive engagement in addressing modern slavery risks within the universities' operations and supply chains. Specific guidelines, clearer measurement methods, and enhanced collaboration with external stakeholders can contribute to achieving these objectives.

This research offers valuable insights into the current state of modern slavery reporting and calls for further research and actions to effectively address this pressing issue.

### 1. Introduction and research gap

Modern slavery, a pressing contemporary issue with worldwide implications, transcends merely economic dimensions. Renowned scholars such as Bales (2009) and Gold et al. (2015) have postulated that the population enduring or susceptible to conditions of modern slavery surpasses any prior epoch in human history. The construct of modern slavery is heterogeneous in its definitions and inextricably linked to allied terms such as "human trafficking." This concept englobes a spectrum of exploitation types, ranging from forced labour to sex trafficking. Modern slavery, in addition to potential legal consequences and reputational damage to organisations, violates the rights and dignity of individuals. As a consequence, the problem of modern slavery has garnered increasing attention from governments, non-governmental organizations (NGOs), and the mainstream media.

Moreover, the impact wielded by large corporations, attributable to their substantial workforce, incites additional apprehensions. The manifestation of modern slavery within the supply chains of multinational corporations has elicited widespread consternation (Christ et al., 2019; LeBaron & Rühmkorf, 2017; Nazli Nik Ahmad & Salat Ahmed Haraf, 2013).

In reaction to the ubiquitous nature of modern slavery, governmental bodies have promulgated regulatory measures and legislation comprising specific directives. A salient enactment amongst these is the UK Modern Slavery Act 2015, which the United Kingdom's Parliament enacted to tackle modern slavery and to encourage corporate responsibility (Islam & Van Staden, 2022). This act emphasizes enhanced corporate responsibility and mandates entities with turnovers exceeding £36 million to unveil their stance on modern slavery. Yet, despite such legal provisions, challenges persist, particularly concerning the clarity and completeness of such disclosures. Moreover, evidence suggests, as highlighted by Craig (2017), that a myriad of entities remains either unaware of or non-compliant with these requirements, leading to disparities in reporting transparency (Islam & van Staden, 2021).

A striking gap in the extant literature centers on the compliance and reporting strategies employed by British universities in response to the UK Modern Slavery Act 2015. Universities, often upheld as paragons of ethical and societal principles, are positioned to set commendable standards for modern slavery disclosures. However, the quality, extent, and consistency of their declarations remain underexplored. This study seeks to fill this research

void, focusing intently on the UK Modern Slavery Act 2015's ramifications on the disclosures of British academic institutions. Historically, while modern slavery topics under Corporate Social Responsibility (CSR) reporting have been largely discretionary, the introduction of this act mandates a more stringent scrutiny of institutional disclosure practices.

The primary objective herein is to evaluate the act's influence on university declarations. This includes assessing any notable advancements in the quality and expansiveness of modern slavery disclosures and determining the proliferation of institutions broaching this critical issue. The research question is succinct: "How does the UK Modern Slavery Act 2015 impact the CSR reporting, particularly concerning modern slavery disclosures, among UK universities?". Simultaneously, the study embarks on an explorative journey to uncover the myriad factors - be they catalysts, deterrents, or barriers - that mold the reporting behaviors of British universities on this pressing issue. Through a rigorous review and comprehensive analysis, the research aims to elucidate current reporting trends, spotlight areas warranting enhancement, and furnish insights that could steer subsequent regulatory and reporting endeavors.

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# 2. UK Universities' and modern slavery disclosure: a literature review

Slavery, with its deeply entrenched roots in human history, remains emblematic of systemic oppression and the exploitation of vulnerable populations. Contemporary times have observed a surge in practices falling under the modern slavery umbrella, further exacerbated by the rapid expansion of global businesses into international markets (Bales, 2009; Christ et al., 2019). Interestingly, the underlying reasons for this rise trace back to the strategic decisions of firms. In their ambitious drive for profitability and consumer satisfaction, many have transitioned from vertical integration to outsourcing, predominantly to poorer nations with cheaper labour resources.

Such et al. (2018) provide a comprehensive definition of modern slavery, encapsulating its multifaceted and sinister nature. Their articulation, which includes trafficking, forced labour, and a myriad of inhumane practices, serves as a stark reminder of its pervasive existence today. Paradoxically, some scholars argue that the magnitude of modern slavery's impact today surpasses any previous era, with developing nations being its prime hotbeds (Crane et al., 2019; Gold et al., 2015).

Private enterprises are far from immune to this blight. LeBaron's (2014) research underscores a disturbing reality: a significant proportion of forced labour within businesses can be traced directly back to the very organizational structures and strategies they adopt. The ongoing COVID-19 pandemic has also spotlighted newer, pandemic-induced forms of exploitation, with companies leveraging their workers' vulnerabilities to the hilt.

The UK's legislative response, the Modern Slavery Act 2015 (UK MSA 2015), was conceptualized as a beacon of hope to improve supply chain transparency and ensure UK businesses uphold their ethical obligations. However, the journey since its enactment has been tumultuous, marked by widespread misconceptions regarding its provisions and doubts about its genuine effectiveness (Craig et al., 2017; The Global Slavery Index, 2018).

Against this backdrop, this review meticulously analyses the disclosures of UK universities concerning the Modern Slavery Act. In response to the provisions of the Act, UK universities have begun to release internal statements and publish their anti-slavery strategies online. But a

closer look raises some important questions: How effective are these disclosures? Are they substantive or mere superficial posturing? Additionally, it is imperative to understand their varied approaches in depth, especially given that universities play multifaceted roles in modern slavery dynamics. As highlighted by reports in "The Guardian", instances exist where universities have indirectly and unvoluntary played a role in the dark trade through mechanisms such as student visa manipulations.

An intriguing theoretical angle to explore in this narrative is that of normativity. At its essence, normativity deals with the extent to which rules and guidelines are acknowledged, standardized, and internalized within an institution or society. Interis (2011) postulates that the potency of normativity is contingent upon widespread acceptance. Applying this theory to the modern slavery disclosures of UK universities could yield valuable insights into their efficacy and the broader influences shaping them.

Furthermore, Corporate Social Responsibility (CSR) disclosures provide an interesting juxtaposition. Historically voluntary in nature, these disclosures, including those on modern slavery, are marked by heterogeneity and subjective selectivity. While regulatory landscapes, such as the UK MSA 2015, offer a semblance of structure, the heart of the debate lies in the effectiveness of mandatory versus voluntary disclosure. Factors like firm size, ownership structures, and managerial inclinations deeply influence CSR disclosures. Yet, the overarching question remains: Can regulatory compulsions genuinely drive substantive and meaningful disclosures?

To conclude, modern slavery, despite various global efforts and legislations like the UK Modern Slavery Act 2015, remains an entrenched global challenge. This literature review, rooted in scholarly research, aims to elucidate the role, effectiveness, and depth of modern slavery disclosures by UK universities. Furthermore, by juxtaposing normativity theory and evaluating the interplay between mandatory and voluntary CSR reporting, this review aspires to offer a nuanced, comprehensive perspective on the issue. Such an exploration, it is expected to pivotal not just for academic purposes, but also for guiding policymakers, institutions, and activists in their ongoing fight against the menace of modern slavery.

## 2.1. Voluntary vs. Mandatory CSR reporting

As mentioned above, Corporate Social Responsibility (CSR) disclosure has predominantly been a voluntary activity, with issues such as modern slavery included within broader human rights and CSR disclosures (Mai et al., 2022). Moreover, CSR disclosure has expanded beyond a mere focus on financial or economic aspects (Turner et al., 2006).

The advent of governmental and regulatory documents, while bringing forth guidelines, has not altered the voluntary nature of CSR reporting. Interestingly, the information voluntarily disclosed often exceeds the mandated requirements (Halkos & Nomikos, 2021). Certain factors drive the decision-making process in firms regarding whether to disclose CSR-related information, thereby influencing the breadth and quality of such disclosure (Christensen et al., 2021).

One such determinant is the firm size, with literature indicating a positive correlation between the size of a firm and the quality of its CSR reports (Hahn & Kühnen, 2013). This relationship can be attributed to monetary considerations, as larger firms might find reporting relatively affordable, and reputational concerns, as the public tends to demand greater transparency from larger corporations (Christensen et al., 2021).

Ownership practices also bear significant influence on CSR disclosure. Evidence suggests that in cases where information must be disseminated amongst a larger shareholder base, particularly amidst information asymmetry, CSR reporting is more likely to transpire (Christensen et al., 2021).

Moreover, corporate governance practices and managerial attributes are instrumental in shaping CSR disclosure. As Dalla Via & Perego (2018) assert, management structures with long-term orientations are positively correlated with CSR disclosure. Personal characteristics of managers, such as their educational background, confidence, experience with CSR issues, and personal beliefs, also influence CSR disclosure practices (Lewis et al., 2014; McCarthy et al., 2017; Peters & Romi, 2015; Parker, 2014). It is important to acknowledge that these factors also have an impact on financial reporting, highlighting the complex influence they exert on reporting practices (Christensen et al., 2021).

However, the effectiveness of mandatory disclosure compared to voluntary disclosure is still a topic of debate and disagreement (Arena et al., 2018; Bebbington et al., 2012).. Some scholars posit that firms might utilize voluntary reporting as a strategy to enhance their image and profitability (Comyns & Figge, 2015). However, such reporting might not provide a comprehensive picture since it is tailored to achieve specific objectives. Arguably, mandatory regulations could enhance the accuracy, quality, and volume of disclosed information (Senn, 2018; Luque-Vílchez & Larrinaga, 2016; Mai et al., 2022).

Yet, research indicates that stricter regulations on corporate reporting practices do not necessarily translate themselves in superior and more exhaustive reports (Chauvey et al., 2015; Luque-Vílchez & Larrinaga, 2016). Arena et al. (2019) further found that improvements in the quantity and quality of reports could not be attributed solely to CSR regulations. These minimal provisions were insufficient to ensure transparency but they seemed to alter the medium of information dissemination, with a shift from CSR or separate reports to annual reports.

Hence, some scholars state that such disclosure primarily retains its symbolic significance (Birkey et al., 2018; Chelli et al., 2018). However, the enactment of regulatory mechanisms, such as the UK Modern Slavery Act 2015, offers an opportunity to assess the impact of mandatory disclosure on modern slavery reporting practices in institutions such as UK universities.

## 2.2. Modern slavery and modern slavery disclosure

In the realm of Corporate Social Responsibility (CSR) disclosures, it's essential to underscore the significant intersection between CSR reporting and modern slavery. While CSR reporting encapsulates a broad spectrum of corporate ethics, sustainability, and governance issues, modern slavery stands out as one of the most pressing human rights concerns that organizations must address today. This connection can be attributed to the growing realization that businesses play a pivotal role in perpetuating or combating grave human rights violations within their value chains. As such, modern slavery, encompassing practices like forced labor and human trafficking, becomes an imperative component within the broader CSR disclosures, reflecting a company's commitment to ensuring ethical practices across its

operations. By integrating modern slavery within CSR reports, corporations not only emphasize their stance against these heinous practices but also showcase their broader commitment to holistic, ethical, and responsible business operations.

Modern slavery, as previously noted, is a longstanding issue on the global stage, particularly in relation to companies' disclosure about human rights and Corporate Social Responsibility (CSR) (Mai et al., 2022). Indeed, modern slavery bears many similarities with human rights and broader CSR matters.

An extensive body of principles and laws underpins human rights (Birkey et al., 2018). In 1948, the United Nations introduced the Universal Declaration of Human Rights, which in its Article 23, upholds the rights and equality of all individuals, regardless of their circumstances. Article 4 explicitly addresses modern slavery, banning all its forms (United Nations, 1948). Furthermore, the International Labor Organization (ILO) was established as a global body.

More recently, the United Nations enacted the UN Sustainable Development Goals in 2015. Its aim was to assure and protect human rights (UNPD). This goal is pursued by avoiding and rectifying undesirable and improper behaviors. The Global Reporting Initiative and the UN Global Compact provided more specific guidelines to enforce these principles.

Nevertheless, there exists no global regulation mandating all businesses to adhere to and respect the provisions of the human rights declaration (Christ et al., 2019).

While the evolution of human rights has been significant, there are noticeable gaps in its enforcement and application. Moreover, modern slavery necessitates its own distinct legislation due to the challenges presented by its changing nature, which is shaped daily by situations of exploitation and abuse, as noted by Mende (2019).

Caruana et al. (2021) document the extent to which modern slavery is prevalent and continues to evolve within businesses. It undeniably constitutes a violation of human rights (Mende, 2019), infringing on numerous principles of international human rights law (Landman, 2020).

Modern slavery has been incorporated into human rights and CSR disclosure for a long time, often voluntary, thus, potentially superficial and included in sections related to topics such as

supply chains. Nevertheless, current research on modern slavery is inadequate and fails to provide a comprehensive perspective, especially concerning UK universities.

# 2.3. Regulation of the modern slavery disclosure and UK Modern Slavery Act 2015

Among the regulatory documents and statements issued by governments in their fight against modern slavery, the UK Modern Slavery Act 2015, ratified by the UK parliament, stands as a noteworthy directive. The Act not only brings to the forefront the gravity of the issue but also serves as a testament to the UK's commitment to tackle the menace. Incorporated within the act is a transparency clause engineered to augment clarity. It compels companies to shed light on their undertakings to confront and mitigate modern slavery practices (Islam & Van Staden, 2022). This enactment, when compared to predecessors such as The California Transparency in Supply Chains Act 2010, seems to exhibit a relatively less rigorous stance, given its ostensibly less detailed disclosure obligations for companies to unearth and counteract modern slavery activities (Christ et al., 2018; LeBaron, 2014).

The UK Modern Slavery Act 2015 stipulates that any company boasting an annual turnover surpassing £36 million is obligated to draft and present a comprehensive statement delineating their strategies to combat modern slavery across their operations and supply chains. A director must endorse this statement, followed by board approval, and it should be prominently available on the company's official website. If a company lacks a web presence, they're required to furnish the statement to any inquiring party within a span of 30 days.

Within the boundaries of the act, companies are directed to address six cardinal facets in their statements. These encompass the very framework of their business, the supply chain intricacies, policies addressing modern slavery and human trafficking, processes for due diligence, risk evaluation and control mechanisms, initiatives initiated to curb modern slavery, and bespoke training modules for employees emphasizing the identification and elimination of modern slavery practices (UK Modern Slavery Act 2015).

However, while the act demarcates these realms of focus, it remains ambiguous about the specific content companies should include in their statements. It also stops short of mandating companies to adopt explicit measures to tackle modern slavery. If a company refrains from taking action, it is incumbent upon them to elucidate the reasons behind this inertia. Although the act refrains from penalizing non-compliance directly, it does hint at potential court injunctions, a move yet to witness implementation (HM Government, 2014). The UK's rationale behind this is the belief that the very obligation to chronicle their modern slavery efforts (or explicate the absence thereof) will galvanize companies into action, spurred by the fear of reputational degradation or other unforeseen repercussions.

Despite its intent, the Act has garnered criticism. Observers like LeBaron & Rühmkorf (2019) contend that the Act remains nebulous in guiding companies on discerning modern slavery activities and rectifying labor exploitation. Studies, such as the one conducted by Stevenson & Cole (2018), have illuminated that a significant proportion of companies either remain reticent about their modern slavery stance or furnish perfunctory statements. However, contrasting assessments from The Global Slavery Index 2016 and The Global Slavery Index 2018 underscore that while certain companies limit themselves to rudimentary declarations, others transcend the foundational prerequisites of the UK Modern Slavery Act 2015 (Mai et al., 2022).

Pertaining to UK universities, it's imperative to emphasize that they too fall under the purview of the Act. A probe by Rogerson et al. (2020) divulged that a quarter of the universities' statements displayed repetitiveness, failed to evolve with the ever-shifting definition of modern slavery, and often culminated in zero tangible actions to combat the issue. While Schaper & Pollach (2021) echoed the critiques against companies for subpar disclosures, they also acknowledged discernible enhancements over time.

In summation, a discernible void exists in the current literature when it comes to evaluating the tangible impact of the UK Modern Slavery Act 2015 on the richness and scope of modern slavery disclosures by entities, especially UK universities, and its ripple effect on the landscape of corporate social responsibility reporting. Through a meticulous review of the existing literature and identification of gaps, we arrive at the central research question: "How does the UK Modern Slavery Act 2015 impact the CSR reporting, particularly concerning modern slavery disclosures, among UK universities?".

### 3. Research design and methodology

In addressing the research inquiries, manual content analysis has harmoniously been integrated with an index approach. Content analysis, a method highly esteemed in studies such as those by Guthrie & Abeysekera (2006) and Hooks & van Staden (2011), serves as a powerful conduit to convert qualitative insights from CSR reports into structured, quantitative data. For the scope of our study, such qualitative content was meticulously assessed, quantified, and subsequently cataloged in an Excel spreadsheet. Thereafter, the amassed data underwent categorical analysis, a procedure guided by methodologies presented by Krippendorff (2004) and Liao et al. (2017).

Following the content analytical phase, the index approach elevated the exploration, particularly in the realm of modern slavery disclosures. This approach, ingrained in the scholarly contributions of Mai et al. (2022) and Rao et al. (2022), facilitated the creation of two bespoke indexes. These indexes served twofold: one to ascertain compliance with the minimum requirements of the UK Modern Slavery Act 2015 and the other to evaluate the extent and quality of modern slavery statements.

The index approach's core premise, as corroborated by Brammer and Pavelin (2004), Clarkson et al. (2008), and Aerts and Cormier (2009), postulates that disclosure quantity can, to an extent, mirror its quality. This methodology frequently employs a binary coding scheme, denoting the presence or absence of specific disclosure facets. Marston and Shrives (1991) have eloquently discussed the intricacies and the subjective nuances that such disclosure indexes encapsulate in accounting research.

It's pivotal to highlight a noteworthy application of the index approach by Soobaroyen and Ntim (2013). Their study delved into corporate modern slavery statements, employing dual coding schemes. Their findings, mirroring insights from studies by Sadiq and Kiran (2016) and Elbardan and Hussainey (2016), reveal a fascinating dichotomy: the volume of a firm's disclosure might not always be congruent with its compliance standards.

In summation, this study harmoniously amalgamates manual content analysis with the index approach. The former offers a granular view of CSR report insights, while the latter provides

an evaluative lens on modern slavery disclosures, both in terms of their quality and compliance with established acts. (See the Appendixes for all the coding tabs the working Excel sheets).

#### 3.1. Data collection

The sample comprises 141 UK state universities. In accordance with the UK Modern Slavery Act 2015, companies with an annual turnover exceeding £36 million are obligated to report on modern slavery. The considered UK universities fulfill this requirement (UK Modern Slavery Act, 2015). The data collection process commenced with gathering the most recent published modern slavery statements from universities. Despite surpassing the £36 million threshold, four universities failed to produce the modern slavery statement. According to the UK Modern Slavery Act 2015, universities are mandated to provide the modern slavery statement within 30 days to anyone who requests it. Regrettably, three of these universities did not fulfill their obligations, even after a request was made. Subsequently, the general characteristics of these universities, including their names, website availability, publication of the modern slavery statement on the website, financial year of the last published modern slavery statement, location, and Times ranking, were recorded in an Excel sheet. Additionally, an extra column was added for potential annotations.

As a subsequent step, to assess compliance with the minimum requirements of the modern slavery statement, a second Excel sheet was created. As outlined in Section 54 of the Modern Slavery Act 2015 (UK Government, 2015), the minimum requirements that must be included in a company's modern slavery statement encompass the following:

- a) Whether the university published a modern slavery statement in 2021
- b) Explanation of the measures taken to combat modern slavery
- c) Approval from the board and signature of the director
- d) Accessibility of the statement on the website
- e) Information about the organizational structure
- f) Information about the policies implemented by the university to combat modern slavery
- g) Details about the due diligence process
- h) Explanation of the risk assessment methodology

- i) Explanation of the performance indicators adopted to evaluate the effectiveness of the implemented actions
- j) Description of the training conducted to educate both employees and non-employees on recognizing and preventing modern slavery practices

To facilitate a preliminary evaluation of universities' compliance with the disclosure requirements, the aforementioned minimum requirements constituted the variables in a table (refers to Appendix A). For each university, the modern slavery statement was assessed, and a value of 1 was assigned to the corresponding variable if the reporting requirements were met, and 0 otherwise.

Furthermore, an additional code was employed to record the specific piece of information pertaining to each of the six primary categories that had been reported. To achieve this, subcategories were introduced within each category. These sub-categories were further classified as narrative, denoting a purely descriptive account, or quantitative, indicating the inclusion of numerical data. The six main categories, which necessitate reporting by companies, are as follows:

- a) Organizational structure,
- b) Policies,
- c) Due diligence,
- d) Risk assessment,
- e) Effectiveness,
- f) Training.

This code constitutes an adaptation of the index developed by Mai et al. (2022). Its purpose is to assign a score to each university, thereby facilitating the evaluation of the quality and extent of their modern slavery statement (refers to Appendix B).

Once again, the six main categories and their corresponding 57 sub-categories serve as the variables within the Excel sheet. For each category, a value of 1 was assigned if the related information was included in the modern slavery statement of the respective university, while a value of 0 was assigned if it was not present (refers to Appendix C).

## 3.2. Reliability of coding procedures

The research method requires establishing reliability. There are two types of reliability: intracoder reliability and intercoder reliability. For this research, it is important to test intercoder reliability. Intercoder reliability measures assess the degree of agreement (or disagreement) between coders' decisions. Some commonly used measures for intercoder reliability include:

- Percentage agreement: This involves comparing the decisions made by different coders and calculating the percentage of cases where they agree.
- Holsti's method: This involves calculating the percentage of cases where two coders make the same decision, divided by the total number of cases.
- Scott's  $\pi$ : This is a measure of inter-coder reliability that takes into account the possibility of chance agreement.
- Cohen's kappa: This is a measure of inter-coder reliability that takes into account the possibility of chance agreement and the distribution of cases across different categories.
- Krippendorff's alpha: This is a measure of reliability that takes into account the level of agreement that would be expected by chance, as well as the level of agreement that is actually observed.

The measure chosen depends on the nature of the data being coded and the research question being addressed (Christ et al., 2019; Stray, 2008). Since the coding process of this study has been carried out by two researchers, a test of the intercoder reliability was necessary. For this purpose, the two researchers independently coded a sample of the same modern slavery reports from universities. The degree of agreement between the two sets of codes has then been calculated using the method of the percentage agreement and of the Cohen's kappa.

The results of the percentage agreement method should provide an indication of how often the two researchers agreed in their coding of the modern slavery reports. As a rough guideline, in most fields, a percentage agreement above 75% is considered acceptable. In the present research endeavor, the inter-rater reliability, as assessed by the percentage agreement method, was found to be 89.39%. This value notably surpasses the generally accepted threshold cited in relevant academic literature, thus reinforcing the credibility of the coding process executed by the researchers (Duriau et al., 2007; Krippendorff, 2013). Would the degree of agreement be low, then the coding process should be refined (Krippendorff, 2013).

Details on the results have then been compared as shown in Table 1.

Table 1: Results of the reliability test for the selected variables

	Percentage agreement
Abertay University	93,86%
Kaplan International College London	95,61%
London Metropolitan University	85,96%
Oxford Brooks University	85,96%
St Mary's University	79,82%
University of Birmingham	100,00%
University of Central Lancashire	97,37%
University of Exeter	94,74%
University of Nottingham	77,19%
University of the Arts London	83,33%
Total percentage agreement =	89,39%

### 4. Findings and data analysis

In the subsequent chapters, a detailed exploration of the compliance levels of UK universities with the Modern Slavery Act of 2015 is presented. Through rigorous data analysis, both the extent and quality of modern slavery disclosures will be assessed. These findings will shed light on the current state of adherence, providing insights into areas of strength and potential gaps. As we delve into each section, the nuances of the narratives and quantitative data will be systematically unpacked, juxtaposed against the Act's requirements. This comprehensive review aims to provide a clearer understanding of the universities' reporting practices in the context of the Act.

#### 4.1. Overview

This study provides an overview of the adherence to the minimum disclosure requirements outlined in the UK Modern Slavery Act of 2015 for the latest modern slavery statement released by universities in the UK. The study investigates the extent and quality of modern slavery disclosure in the statements of these academic institutions. The results are presented below, and the report proceeds with a detailed examination of the findings for each of the disclosure categories specified by the Act.

The compliance with the minimum disclosure requirements of the Act in the last released statement as of the date of data collection and the availability of a statement for 2021 are summarized in Figure 1.

#### Compliance with the minimum requirements of the UK MSA 2015

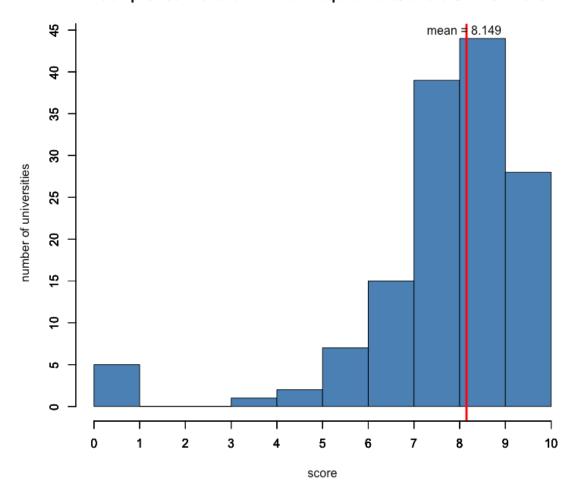


Figure 1: Compliance with the minimun requirements of the UK Modern Slavery Act 2015

The study indicates that universities demonstrate a high level of adherence to the minimum requirements of the Act, with many scoring between 8 and 10 out of 10. The study shows that 128 universities in the sample have issued a modern slavery statement in 2021, indicating that relevant reporting has become standard practice (untabulated). However, the study highlights concern about the auditing and enforcement mechanisms, as 13 universities did not issue a modern slavery statement in that year despite its legal requirement. Furthermore, some universities exhibited limited compliance with the Act.

The dimensions of measurement, extent and quality, which will be evaluated next, represent distinct yet essential attributes that measure the compliance of companies. Extent is a quantitative measure that quantifies the number or percentage of items that have been complied with. It represents the degree or amount to which compliance exists, happens, or is present.

In contrast, quality represents the standard or level of excellence of compliance measures. It encompasses the degree of completeness, accuracy, and effectiveness of the measures implemented by universities to achieve compliance. In other words, it can be seen as the degree of compliance of narrative and quantitative information.

In the present context, the extent of compliance is determined by calculating the percentage of narrative items complied with by individual companies. This is achieved by dividing the total number of narrative items by the sum of total narrative items a particular university reported on. The average compliance across all universities is then determined by computing the total percentage of compliance achieved by all universities and dividing it by the total number of universities.

Similarly, quality is calculated as the mean score across all universities reporting out of a total of 114 (obtained assigning 0 or 1 to each subsection, narrative or quantitative, of the subcategories considered) in percentage terms. This means that the compliance measures of each university are scored and added up to get a total score, which is then divided by the total number of universities to get an average score in percentage terms.

It should be noted that the same method is employed when calculating percentages for each category. This ensures that the extent and quality of compliance are calculated separately for each category, providing a comprehensive assessment of compliance across them.

The research shows that there is significant room for improvement for both aspects, and the extent and quality of disclosure vary per disclosure area. Business structure areas are discussed more frequently, while effectiveness is the least discussed. The study notes that the overall findings for extent and quality are highly consistent with each other concerning the disclosure area considered. However, lower scores are noted for quality compared to the extent of disclosure, suggesting that most published information is either general or lacking numeric or monetary values.

#### 4.2. Disclosure areas

#### 4.2.1. Business structures disclosure

One of the key requirements of the UK Modern Slavery Act (2015) is that universities must include information on their organizational structure and supply chains in their modern slavery statement. This paper aims to analyze the specific organizational structure and supply chain information that universities need to include in their modern slavery statement by drawing on academic sources.

In order to promote greater awareness of potential risks of modern slavery, universities are obligated to provide an overview of their business operations, including any subsidiaries or joint ventures, in their modern slavery statement (UK Modern Slavery Act, 2015). This requirement is particularly important for complex organizational structures where identifying and addressing modern slavery risks can be challenging (Oxfam, 2018). The higher education sector, like other industries, has recognized the pressing issue of modern slavery, and there is an increasing expectation for universities to play an active role in preventing modern slavery risks in their operations and supply chains.

To effectively address this issue, universities must establish a clear organizational structure and accountability mechanisms to tackle modern slavery risks throughout their entire organization. This includes ensuring that all employees understand their responsibilities in relation to modern slavery prevention.

Describing the organizational structure in the modern slavery statement serves the purpose of preventing modern slavery. This can involve establishing clear accountability mechanisms, policies and procedures, training programs, and reporting mechanisms.

Furthermore, universities need to employ various methods such as risk assessments, supplier audits, and due diligence processes to identify and mitigate modern slavery risks in their operations and supply chains (Financial Reporting Council, 2022). Additionally, universities should provide information on their suppliers' modern slavery prevention policies and procedures, including how suppliers are expected to report on modern slavery risks and how they are held accountable for addressing these risks. By enforcing strong modern slavery

prevention measures among suppliers, universities can contribute significantly to preventing modern slavery in their supply chains.

It is crucial for universities to adopt a proactive approach and establish clear policies and procedures to identify and address modern slavery risks in their operations and supply chains. Collaboration between universities and suppliers is essential, and universities can support and guide suppliers in identifying and addressing modern slavery risks. These measures demonstrate universities' commitment to preventing modern slavery and ensuring ethical and sustainable operations and supply chains (Lake et al., 2015).

Overall, including information on organizational structure and supply chains in modern slavery statements is vital for promoting transparency, accountability, and collaboration in modern slavery prevention efforts. Through a comprehensive analysis of organizational structure and supply chain information, universities and companies can take effective action to prevent modern slavery within their organizations and across their supply chains.

Regarding supply chain information, universities, like other companies, must provide an overview of their supply chains in their modern slavery statements. This includes information about countries or regions where products or services are sourced and how they are identifying and addressing modern slavery risks in their supply chains (UK Modern Slavery Act, 2015). To prevent modern slavery effectively, universities should proactively identify and address risks before they become a problem. They can employ various methods such as risk assessments, supplier audits, and due diligence processes to mitigate modern slavery risks in their supply chains. Additionally, universities should provide information on their suppliers' modern slavery prevention policies and procedures, including reporting requirements and accountability measures. This facilitates collaboration between universities and suppliers, with universities offering support and guidance to suppliers in identifying and addressing modern slavery risks.

The modern slavery statements of UK universities aim to provide an overview of the university's business nature, organizational structure, sources of goods or services, supply chains, and workforce, offering insight into potential modern slavery risks. This study's findings indicate that while there is a higher extent of modern slavery disclosure, the quality falls below the 50% threshold for four out of seven subcategories (refers to Figure 2). The

subcategories that reported the highest frequency percentage were, for both extent and quality, sectors and business (90,78% and 71,63% respectively), supply chains (86,52% and 59,57% respectively) and structure and group relationships (80,14% and 50% respectively), while those with the lowest, and only one under 50%) was source countries (29,08% and 18,09% respectively). Among the subcategories, business structure registered the highest scores for both extent and quality.

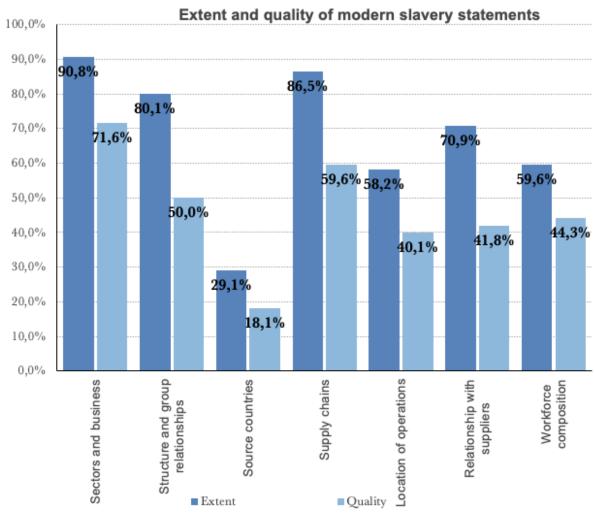


Figure 2: Business structure: Extent and quality of compliance per subcategory of modern slavery statements of UK universities

In terms of universities' performance, an examination of the disclosure scores reveals that the average score for extent was 4.75 out of 7, with a subset of 25 out of 141 universities attaining the maximum score of 7. As for the quality of disclosure, the average score was 6.51 out of 14, with no universities reaching the maximum score (refers to Figure 3a and Figure 3b).

Notably, it should be mentioned that 8 universities either did not provide information on this particular category or failed to produce their modern slavery statement.

Although universities frequently provide information on their business sector, structure, group relationships, supply chains, and locations of operations, most of the information provided is in narrative form, lacking quantitative or monetary measures. Specifically, the quality of information pertaining to source countries within the subcategory is notably deficient, with a score of merely 18.1%. This deficiency stems from the brevity and generality of the disclosed information. Consequently, there is a clear need for enhancing this type of disclosure to achieve higher quality standards.



#### Business structure: extent of disclosure

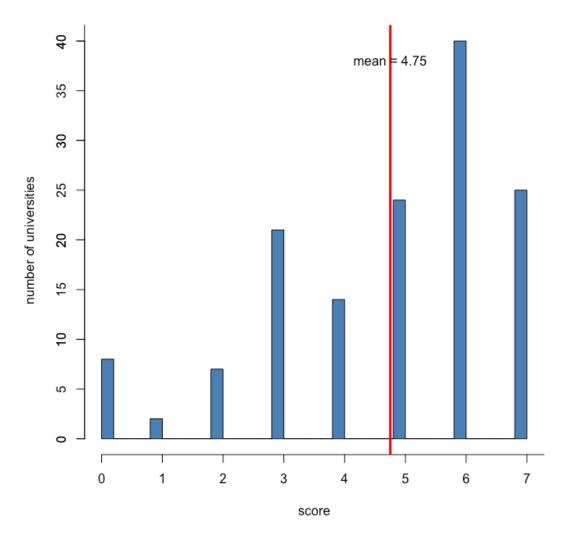
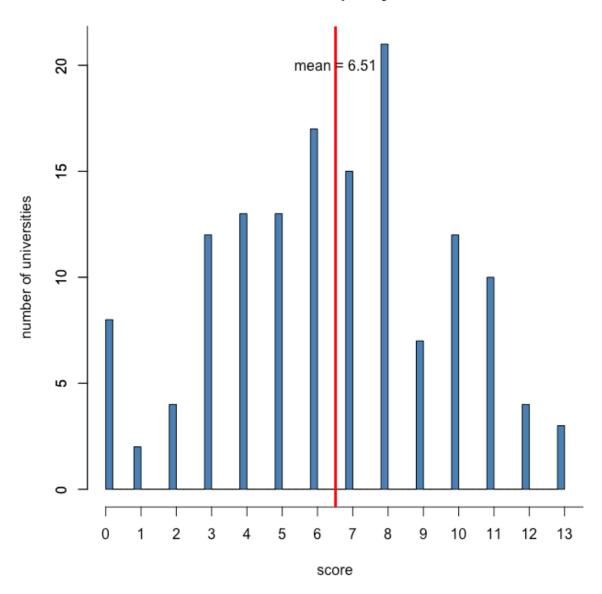


Figure 3b: Quality of UK universities' disclosure on the category "business structure"

#### Business structure: quality of disclosure



## 4.2.2. Policies disclosure

Analogous to companies, higher education bodies are expected to delineate their modern slavery-related policies within their annual reports, encompassing an ethical conduct code, supplier code of conduct, recruitment regulations, and other relevant international norms such as the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (UK Government, 2015).

This research elucidates a significant variation in the volume and calibre of modern slavery policy disclosures among universities. The disclosure extent fluctuates from 12.05% in the context of financial constraints to 93.61% for internal regulations, while the disclosure quality spans from 7.09% for financial constraints to 62.77% for internal regulations (refers to Figure 4).

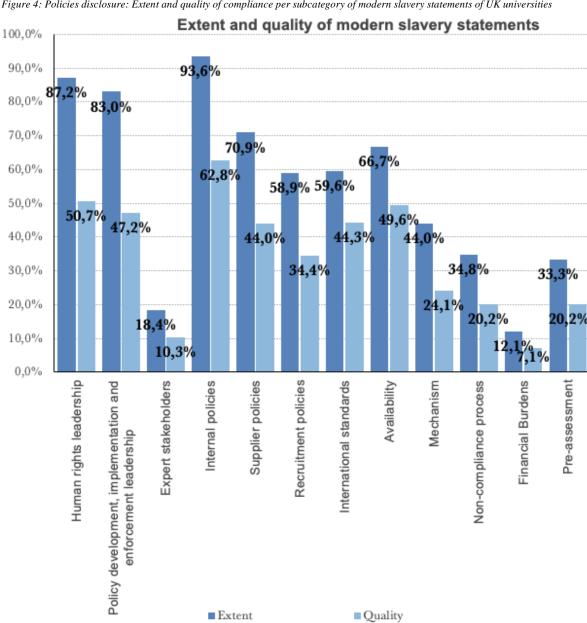


Figure 4: Policies disclosure: Extent and quality of compliance per subcategory of modern slavery statements of UK universities

Considering the score per university, on average it has been registered a score of 6.68 out of 12 for the extent of modern slavery policy reporting (refer to Figure 5a) and 8.31 out of 24 for the quality of disclosure (refer to Figure 5b).

Furthermore, only 5 universities reported a maximum score of 12 out of 12 for the extent of disclosure on modern slavery policy and none a maximum score of 24 out 24 for the quality.

Figure 5a: Extent of UK universities' disclosure on the subcategory "policy"

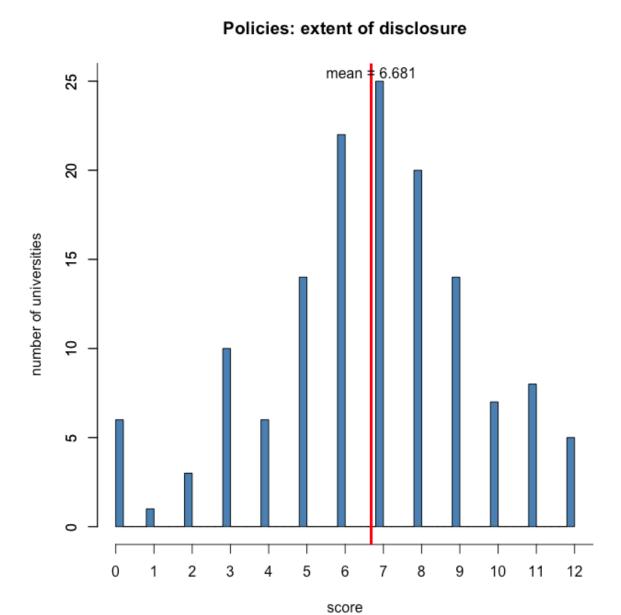
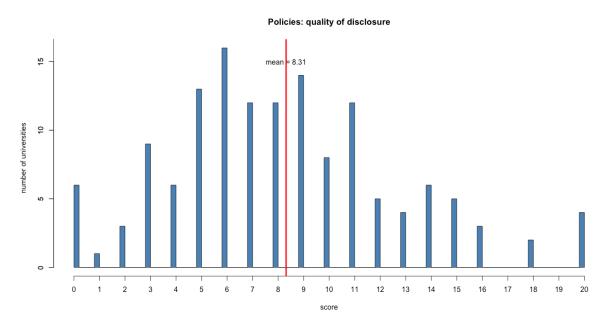


Figure 5b: Quality of UK universities' disclosure on the category "policy"



Preceding the inception of the Act, universities generally integrated information concerning modern slavery policies within other reporting documents, typically quite general, resulting in fairly low extent and quality of modern slavery policy disclosures. This postulate is corroborated by the research of Mai et al. (2022), which expounded on the elevation in companies' modern slavery-related disclosure subsequent to the enforcement of the UK Modern Slavery Act 2015.

Following the Act's implementation, reporting on modern slavery-related policies became compulsory. Universities began consistently unveiling information pertinent to modern slavery policies, encapsulating internal policies, supplier policy disclosures, and recruitment policies. The most frequently reported internal policy was the institutional code of conduct and the supplier code of conduct.

Despite this escalation in disclosure, universities persistently grapple with challenges pertaining to the disclosure of particular aspects of their modern slavery policies. Disclosures in the context of consultation with expert stakeholders, financial burdens, non-compliance procedures, and pre-assessment were minimal and did not exceed 20%. Among these elements, there was minimal disclosure concerning the protocols for non-compliance, which depict how an institution addresses suppliers or employees who breach its standards and policies pertaining to modern slavery.

Moreover, certain universities proffered minimal or no information on their modern slavery-related policies. For instance, this study discovered that the University of Southampton, Bedfordshire, and Birmingham, among others, provided merely a broad statement on their dedication to combating modern slavery and human trafficking, devoid of any specific details on the policies or practices associated with these matters.

The relatively high degree of disclosures cited in this section might be attributed to the established practice of corporations reporting on modern slavery-related policies in their annual and CSR reports. The deficiency of control and communication with suppliers constituted a formidable impediment for corporations to report on diverse aspects associated with modern slavery. Although some universities may have been inexperienced in reporting, insufficient information related to certain sub-categories remains an ongoing hurdle for corporate social responsibility (CSR) reporting (Owen et al., 2001; Unerman, 2007).

In conclusion, while some universities produce comprehensive disclosures, others provide minimal information and 6 no information at all. Institutions such as the University of Nottingham and the University of Glasgow have devised comprehensive policies associated with modern slavery, whilst other universities have provided only a general statement on their dedication to addressing modern slavery and human trafficking. The extent and quality of modern slavery policy disclosures vary significantly among corporations, but an elevation in disclosure has been observed since the Act's introduction, as indicated by Mai et al. (2022) for corporations. Universities continue to confront challenges in disclosing certain aspects associated with modern slavery policies, with inadequate stakeholder engagement, financial burdens, non-compliance procedures, and pre-assessment presenting continued difficulties for CSR reporting.

## 4.2.3. Due diligence disclosures

UK universities, as substantial consumers of goods and services, have a moral and legal obligation to ensure the eradication of modern slavery within their supply chains and thus, they are mandated to report information on due diligence on their modern slavery statement.

A study from the University of Bath reveals challenges faced by UK universities in adhering to the Modern Slavery Act of 2015, which mandates organizations to disclose their preventive measures against slavery in their organizations and supply chains. The Act's requirement has led to an increase in due diligence disclosures; however, the disclosure quality has varied significantly and often falls short of sufficiency (Rogerson et al., 2020).

The study posits that these institutions primarily adopt a minimalist approach, resorting to mere box-ticking for basic compliance rather than demonstrating leadership and proactive engagement in tackling the issue. Various impediments to full compliance have been identified, including a lack of visibility of supply chains, limited in-house supply chain management skills, and the willingness to collaborate just to achieve minimal compliance. Moreover, the study underscores that universities should foster closer relationships with their private sector suppliers to enhance their understanding of supply chain processes and encourage the sharing of supply chain data amongst educational institutions (Rogerson et al., 2020).

In general, the literature seems to show that UK Universities, among all other companies, often redact statements that turn out to be rather symbolic than substantive.

According to Mai et al. (2022), the enactment of the Modern Slavery Act 2015 has markedly increased the extent and quality of information disclosed in annual reports and CSR statements of UK companies. Therefore, it is plausible to expect a similar trajectory in the case of UK universities.

Before the introduction of the UK Modern Slavery Act 2015, disclosures were primarily broad references to human rights or specific references to underage labor. However, from 2016 onwards, the extent and quality of the information significantly improved. These disclosures have expanded to include more substantive aspects of supply chain management, such as monitoring suppliers, grievance mechanisms, contract provisions, collaborations with NGOs, pre-assessments prior to signing contracts, and requirements for first-tier suppliers to cascade the organization's modern slavery standards through their own supply chains (Mai et al., 2022).

Mai et al. (2022) demonstrated an improvement in disclosure by UK companies regarding their due diligence on modern slavery. Despite this, further improvements are needed, particularly concerning direct engagement with workers in supply chains and ensuring that first-tier suppliers adopt and extend the university's modern slavery standards to their own supply chains.

Regarding UK universities, the findings of this study revealed that 13 universities did not include information on due diligence in their modern slavery statements, while only 11 achieved a score of 10 out of 10 for the extent of disclosure in this category (refers to figure 6a). However, none of the universities reported the maximum score of 20 for the quality of disclosure (refer to Figure 6b). Furthermore, the assessment indicates that, based on the analyzed modern slavery statements, universities scored on average 5.02 out of 10 in relation to the extent of the information provided (refer to Figure 6a) and 6.09 out of 20 for its quality (refer to Figure 6b). These findings signal a need for improvement in the extent and quality of due diligence conducted by universities.

Upon examining the individual sub-categories, the extent of disclosure was highest for the subcategory of supplier monitoring (80.85%), upcoming actions (63.83%), and contract provisions (63.12%), while the lowest scores were observed for the grievance mechanism in suppliers (28.08%), first-tier supplier cascade (30.5%), and workers in supplier engagement (35.46%) (refer to Figure 7).

The quality of disclosure was generally low, with only one subcategory scoring more than 50%. Similarly to the findings for the extent of disclosure, the minimum score for the quality of disclosure was reported for the grievance mechanism in suppliers (16.67%), first-tier supplier cascade (17.38%), and workers in supplier engagement (18.44%) (refer to Figure 7).

In essence, while some academic institutions report information about their due diligence in relation to modern slavery within their operations, it is not always exhaustive and shows the need for improvement in both extent and quality.

# Due Diligence: extent of disclosure

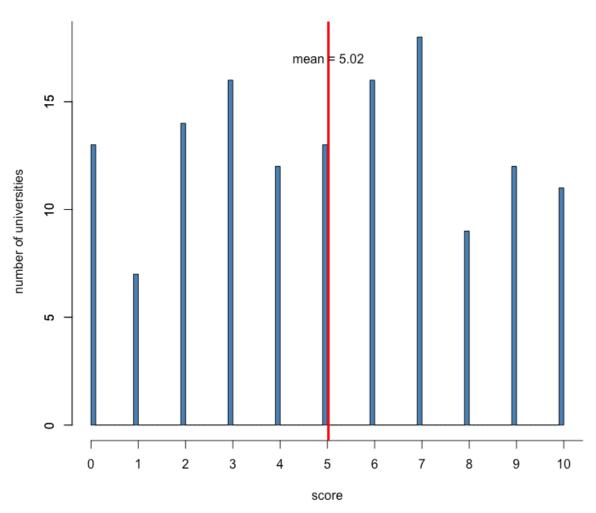
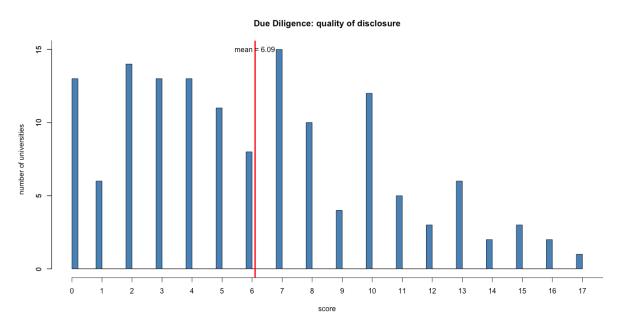


Figure 6b: Quality of UK universities' disclosure on the subcategory "due diligence"



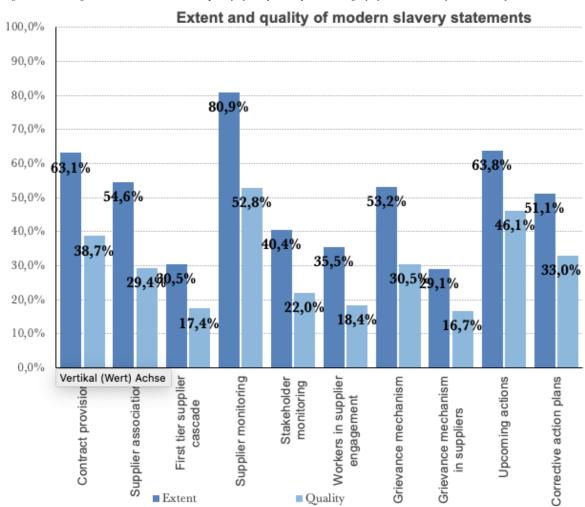


Figure 7: Due diligence disclosure: Extent and quality of compliance per subcategory of modern slavery statements of UK universities

# 4.2.4. Risk assessment

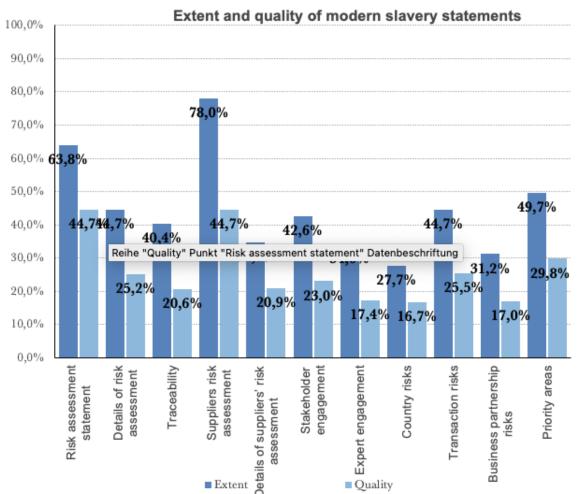
Universities, like companies, are bound by the requirements of the Modern Slavery Act 2015, which mandates the production of risk assessments to identify and address modern slavery risks. These risk assessments play a crucial role in helping universities identify areas within their operations and supply chains where modern slavery and human trafficking may occur and take appropriate steps to manage and mitigate those risks.

In their mandated annual 'slavery and human trafficking statement,' entities are required to elucidate aspects of their business and supply chains that are potentially vulnerable to modern slavery. Nevertheless, the evaluation of disclosure outcomes suggests that the scope of disclosure failed to reach a 50% threshold for all subcategories, with the sole exceptions of

"risk assessment statements" (63.8%) and "suppliers' risk assessment" (78%). The lowest degree of disclosure was noted in the "country risk" subcategory, registering only 27.7%.

When scrutinising the quality of these disclosures, the evaluation results showed that every sub-category exhibited a quality score of less than 50%. Among universities, the reporting rate stood at 50%, with the poorest score recorded for the risks associated with business partnerships (17.02%). In contrast, the most favourable scores were seen in general "risk assessment statements" and "supplier risk assessments" categories, both scoring 44.7% (refer to Figure 8).

In essence, while some academic institutions recognise the potential risk of modern slavery within their operations, comprehensive details pertaining to risk assessments are frequently absent.



Figure~8: Risk~assessment~disclosure:~Extent~and~quality~of~compliance~per~subcategory~of~modern~slavery~statements~of~UK~universities~assessment~disclosure:~Extent~and~quality~of~compliance~per~subcategory~of~modern~slavery~statements~of~UK~universities~assessment~disclosure:~Extent~and~quality~of~compliance~per~subcategory~of~modern~slavery~statements~of~UK~universities~assessment~disclosure:~Extent~and~quality~of~compliance~per~subcategory~of~modern~slavery~statements~of~UK~universities~assessment~disclosure:~Extent~and~quality~of~compliance~per~subcategory~of~modern~slavery~statements~of~UK~universities~assessment~of~compliance~per~subcategory~of~compl

Additionally, the assessment indicates that, basing on the modern slavery statements analyzed, universities scored on average 4,91 out of 11 in relation to the extent of the information provided (refer to Figure 9a) and 5,7 out of 22 for its quality (refer to Figure 9b). These findings underscore a significant gap in the extent and quality of risk assessments conducted by universities.

Figure 9a: Extent of UK universities' disclosure on the subcategory "risk assessment"

## Risk Assessment: extent of disclosure

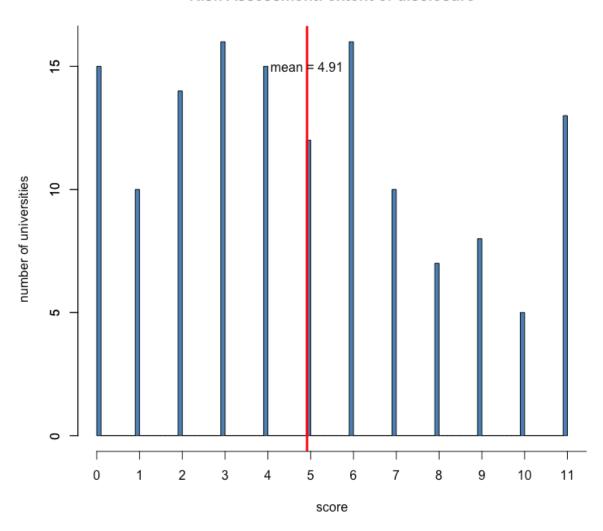
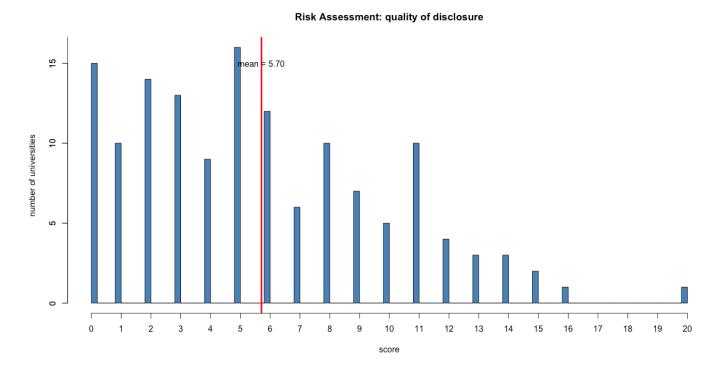


Figure 9: Quality of UK universities' disclosure on the subcategory "risk assessment"



To address these challenges, organizations, including universities, commonly engage the services of third-party entities. These third-party services offer specialized expertise, data, and resources to help organizations assess and mitigate modern slavery risks within their supply chains. In the UK context, some notable third-party services include:

- SEDEX (Supplier Ethical Data Exchange): SEDEX functions as a membership-based organization that provides a platform for the exchange of ethical data. It equips organizations with the necessary resources and assessment mechanisms to manage social and environmental risks within their supply chains, including the critical aspect of modern slavery risks.
- Stop the Traffik: This globally-oriented organization focuses on preventing human trafficking and modern slavery. By leveraging its extensive expertise, Stop the Traffik offers comprehensive resources, research, and training programs, empowering organizations to identify and combat these insidious issues within their operational and supply chain frameworks.
- Global Slavery Index: The Global Slavery Index stands as an initiative that meticulously generates data and conducts research on modern slavery worldwide. By

offering a comprehensive database encompassing country-level risk assessments and pertinent indicators, this resource enlightens organizations regarding the prevalence and risks of modern slavery across various regions.

- Ethical Trading Initiative (ETI): ETI, an influential alliance of companies, trade
  unions, and NGOs, spearheads the promotion of ethical trade practices. With its
  arsenal of resources, guidance, and training programs, ETI equips organizations with
  the necessary tools to address social and labor challenges, including the daunting issue
  of modern slavery.
- Responsible Business Alliance (RBA): Formerly known as the Electronic Industry
  Citizenship Coalition, the Responsible Business Alliance assumes the role of an
  industry association dedicated to fostering responsible supply chain practices. By
  providing critical tools, conducting audits, and facilitating training programs, RBA
  assists organizations in assessing and managing risks, encompassing those posed by
  modern slavery.

These esteemed third-party services offer a plethora of resources to enable organizations to gain deeper insights into modern slavery risks and devise effective risk assessment and management strategies. By harnessing the specialized expertise and data provided by these services, both companies and universities can fortify their endeavors in tackling modern slavery within their intricate supply chains.

In terms of norm conditions, the limited extent and quality of disclosure regarding suppliers suggest a lack of control and communication with suppliers concerning modern slavery issues. However, there is an encouraging trend of collaboration between universities and external entities indicating a growing recognition of the need for collective action in combating modern slavery.

While the Modern Slavery Act has played a significant role in raising awareness about modern slavery and human trafficking, ongoing efforts are necessary to ensure its provisions are effectively implemented and enforced, particularly within complex organizations such as universities. This entails not only conducting risk assessments but also taking concrete measures to mitigate identified risks and promptly addressing instances of modern slavery

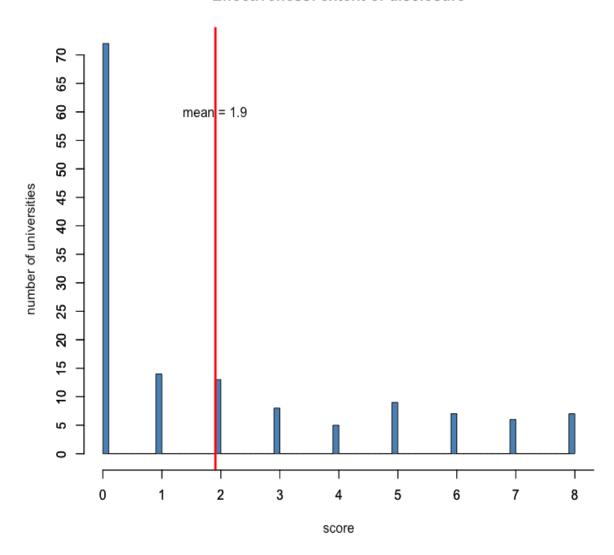
when they are discovered. Challenges faced by universities in implementing risk assessments include the complexity of their supply chains, limited resources, and a lack of expertise. To overcome these challenges, universities should encourage to foster collaboration with external stakeholders, invest in training programs, establish clear guidelines for supplier selection and monitoring, and leverage technological advancements and data analytics.

## 4.2.5. Effectiveness

The UK Modern Slavery Act 2015 (MSA) requires companies to report on their effectiveness in ensuring that slavery and human trafficking are not taking place in their business or supply chains (UK Modern Slavery Act 2015). This part examines the category effectiveness of modern slavery statements made by UK universities, as measured against performance indicators specified by the Act. Effectiveness is a crucial aspect of these statements, reflecting universities' commitment to combat modern slavery. However, this analysis reveals that effectiveness had the lowest scores in terms of both extent and quality throughout the examined period (un-tabulated) (Home Office, 2017).

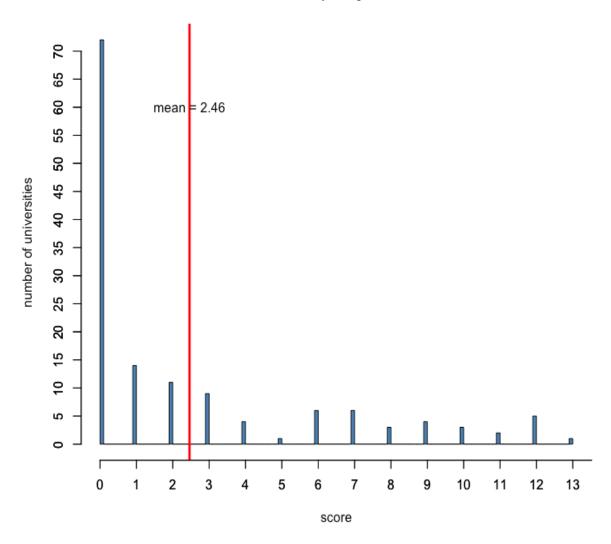
This study has found that information on effectiveness have been provided only from 69 universities out of 141, basing on the statements collected (refers to Figures 10a and 10b), indicating a limited compliance. The most commonly used key performance indicators (KPIs) for measuring effectiveness included the number of staff trained on company policies and standards, the number of concerns or complaints related to modern slavery reported through whistleblowing, and the number of completed risk assessments. However, only 7 universities achieved a score of 8 out of 8 for the extent of compliance, and there were ambiguities regarding the measurement methods. On average, as shown from Figure 10a, universities scored a disappointing 1.9 out of 8 for the extent of disclosure on effectiveness.

## Effectiveness: extent of disclosure



Similar results were observed for the quality of disclosure on effectiveness, as universities achieved an average score of 2.46 out of 16 (refer to Figure 10b).





The extent of disclosure was highest for the subcategory of measurement method (38.29%), while the lowest scores were observed for expert stakeholders (14.18%) and results of grievances (15.60%) (refer to Figure 11).

Similarly, the quality of disclosure was generally low, with no subcategory scoring more than 25.89%. Expert stakeholders (7.09%) and results of grievances (9.57%) received the lowest quality scores. Additionally, only one university scored 13 out of 16 for the quality of disclosure (refer to Figure 11).

Extent and quality of modern slavery statements 100,0% 90,0% 80,0% 70,0% 60.0% 50,0% 40,0% 38,3% 30.0% 25,9%25,5% 20,0% 20,6% 6,3% 15,3% 6,0%15,6 15,3% 10,0% 0.0% A Standard S Business decisions by the Measurement method Results of measurement Reviews progress against Review of existing KPIs Expert stakeholders Results of grievances KPIs & revises Extent

Figure 11: Effectiveness disclosure: Extent and quality of compliance per subcategory of modern slavery statements of UK universities

These scores were the lowest among the six sections analyzed. Some universities, such as Abertay University and the University of Manchester, did not provide any measures for effectiveness, while others like University of London and the Ulster University, provided more comprehensive reports, including descriptions and results of the KPIs used. However, overall extent and quality were generally low across different items, showing the need to improve the reporting in this category.

The lack of transparency in measuring effectiveness is probably to reconduct to the difficulty of quantifying and measuring the outcomes and impacts related to human rights and modern slavery, which are multidimensional issues. In the study of Mai et al (2022), the same difficulty in reporting on effectiveness has been registered among the companies analyzed. They showed that some companies mentioned ongoing efforts to establish KPIs, while others

proposed alternative approaches such as working condition assessments and supply chain risk management tools.

The analysis of disclosure on effectiveness highlights challenges associated with the intrinsic nature of the norm, including a lack of guidance and consistency with other practices, as well as a lack of experience in reporting related issues. While the MSA suggests reporting on measurement against performance indicators, the guidance provided by the Home Office is broad and lacks specificity. Additional guidance from organizations like the Global Reporting Initiative (GRI) and Sustainable Development Goals (SDGs) is also limited in terms of comprehensively measuring effectiveness. Normativity could play an important role in this scenario in the future, since improving the guidelines for reporting on effectiveness and modern slavery in general will offer universities among other companies the skills to develop their own measurement indicators (Home Office, 2017).

# 4.2.6. Training

The UK Modern Slavery Act of 2015 has been a significant impetus for universities in the UK to implement training programs aimed at educating staff about modern slavery and human trafficking, two grave global issues. This enactment mandates eligible institutions, such as universities and companies, to provide and report on training about these practices to their staff and suppliers or business partners.

The University of Cambridge, for instance, offers a tailored online course which explores the facts and figures about modern slavery and human trafficking. The course, which is hosted on the University's Moodle learning platform, is particularly recommended for staff working in finance and procurement roles. This underlines the relevance of these issues in financial transactions and supply chains. The course's curriculum focuses on understanding what constitutes modern slavery and human trafficking, the applicability of the Modern Slavery Act 2015 to the University, and ways to identify signs that indicate the occurrence of these inhumane practices.

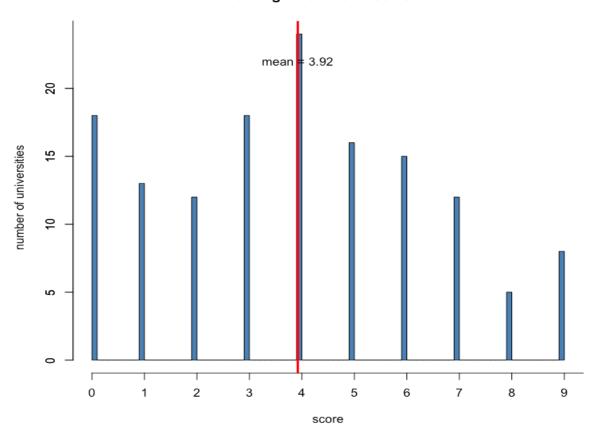
Likewise, the University of Edinburgh has designed various programs and courses examining issues of modern slavery and human trafficking. These initiatives supplement their ongoing research on human rights in supply chains and the impact of the UK Modern Slavery Act. This multifaceted approach promotes a more profound awareness and understanding of modern slavery while simultaneously contributing to the broader body of knowledge on the topic.

However, a detailed analysis of companies' reporting on training programs reveals some deficiencies. Despite a legal mandate, disclosure on training was missing in the statements of 18 universities out of 141.

The analysis indicated that universities score on average 3.92 out of 9 with regard to the extent of disclosure on training (refer to Figure 12a), while the average disclosure quality scored was 4.73 out of 18 (refer to Figure 12b). Furthermore, the maximum score of 9 for the extent of disclosure was achieved by 8 out of 141 universities, and no universities achieved the maximum score of 18 for the quality if disclosure. There was only a university that scored 16 (and the maximum for the extent) and was the University College London.

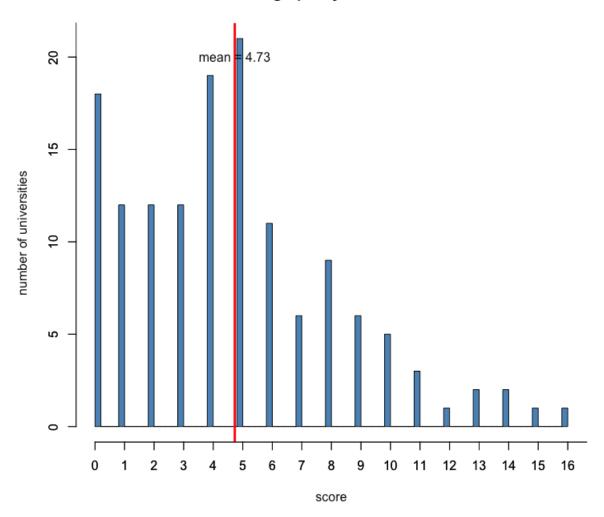
Figure 12a: Extent of UK universities' disclosure on the subcategory "training"

# Training: extent of disclosure



 $Figure\ 12b:\ Quality\ of\ UK\ universities'\ disclosure\ on\ the\ subcategory\ "training"$ 





Upon examining the data breakdown by subcategory, the lowest percentages in terms of disclosure extent were observed in the subcategories of "external experts" (22%), "performance" (22.7%), and "frequency" (25.5%). Conversely, the highest percentages (and the only ones exceeding 50%) were found in the categories of "trainings for the company policies and standards" (82.3%) and "training plans" (64.5%) (refer to Figure 13).

With regard to the quality of disclosure, the highest percentage narrowly surpassed the 50% threshold, specifically in the subcategory of "trainings for the company policies and standards" (55.3%). The lowest percentages for the quality of reporting were, mirroring the pattern seen in the extent of disclosure, "external experts" (12.4%), "performance" (13.1%), and "frequency" (16.3%) (refer to Figure 13).

In general, reporting on training also shows the need of improvement.

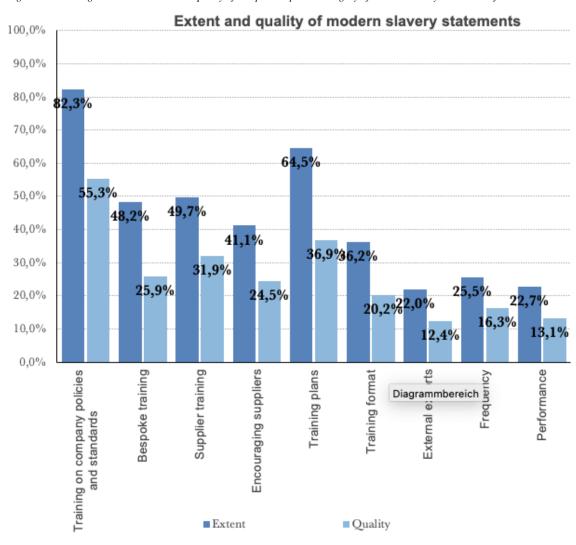


Figure 13: Training disclosure: Extent and quality of compliance per subcategory of modern slavery statements of UK universities

## 5. Discussion

The Modern Slavery phenomenon, defined by forced labor, sex trafficking, and other exploitative activities, remains a significant challenge for contemporary society. The issue becomes more pressing as these practices seep into global corporate supply chains, amplifying concerns about ethical commerce, transparency, and corporate responsibility. The increasing complexity of supply chains due to globalization means that distant problems related to modern slavery might have more immediate consequences than previously thought. Universities, traditionally regarded as bastions of ethics and knowledge, play a critical role in addressing this issue.

The UK Modern Slavery Act 2015 stands as a significant policy effort, building on the UK's historical stand against slavery. It mandates entities, including universities with turnovers exceeding £36 million, to issue a modern slavery statement, emphasizing the need for transparency. However, despite the Act's intent, practical implementation often falls short, as highlighted by this research on UK universities.

Focusing on these universities, the study assessed their disclosure practices concerning modern slavery and their compliance with the UK Modern Slavery Act 2015. The investigation produced the following insights:

### **Business Structures Disclosure:**

Expected findings: Universities, being centers of excellence and governance, were predicted to lead in transparency and accountability, offering in-depth insights into organizational structures, supply chain management, and potential risks. It was expected that they would be at the forefront, setting examples in transparency and accountability.

Actual findings: The results highlighted a stark divergence from expectations. While a considerable extent of disclosure was observed, the quality remained underwhelming. Specifically, the lack of quantitative and monetary values in the statements suggests a minimalist approach to compliance.

### Policies Disclosure:

Expected findings: Universities, given their structured governance, were expected to have a well-detailed policies on modern slavery, incorporating international standards and ethical guidelines.

Actual findings: The variance in the volume and quality of disclosures is worrisome. With few institutions achieving full extent scores and none achieving full quality scores, it underscores the institutional challenges of aligning policy declarations with the Act's requirements.

## Due Diligence Disclosures:

Expected findings: Universities, with their complex networks and supply chains, were expected to be particularly vigilant, detailing their due diligence efforts to curb modern slavery.

Actual findings: The minimalist approach noted in business structures disclosure was again evident. Many universities failed to provide due diligence information or, when provided, lacked depth and comprehensiveness.

### Risk Assessment:

Expected findings: Considering the extensive reach and influence of universities, detailed risk assessments regarding modern slavery were anticipated.

Actual findings: The findings highlighted a significant gap, with many institutions not detailing the necessary risk assessments. Collaborations with third parties were noted, but the overall landscape reveals a need for a systematic overhaul in risk assessment practices.

### **Effectiveness:**

Expected findings: Given the imperative to combat modern slavery, universities were expected to detail the effectiveness of their strategies, showcasing key performance metrics.

Actual findings: The study found limited compliance, with many universities failing to provide information on effectiveness. The multifaceted nature of the issue and a lack of clear reporting guidelines seem to be contributing factors.

### **Training:**

Expected findings: As institutions of learning, universities were expected to be at the forefront of training initiatives on modern slavery.

Actual findings: The disclosures regarding training were inadequate, both in quality and extent. Despite some institutions, like University College London, showcasing significant efforts, a widespread need for enhancement was identified.

To conclude, even if the UK Modern Slavery Act 2015 catalyzed some changes in the disclosure practices among UK universities, a palpable gap persists between policy aspirations and real-world actions. While the UK Modern Slavery Act 2015 has undeniably progressed the dialogue, compelling institutions to reflect on modern slavery, the real success measure remains in its genuine application. Universities, traditionally seen as torchbearers of ethical practices, need to introspect and overhaul their reporting mechanisms. Given their influence and reach, they hold a pivotal role in the larger fight against modern slavery. The study underscores the necessity for clearer guidelines, rigorous reporting, and enhanced collaborations to bridge the identified gaps.

# **5.1.** Limitations of the Study

Every research, even with a rigorous design and meticulous execution, possesses inherent limitations. These constraints can stem from methodological decisions, the study's scope, the data used, and unpredictable external factors. Acknowledging these limitations emphasizes the research's transparency and honesty and ensures readers approach the findings with due caution. It is paramount to understand these limitations to contextualize the results correctly and to identify potential avenues for subsequent research.

### Scope Limitation:

This research primarily focuses on UK state universities with an annual turnover exceeding £36 million. The findings may, therefore, not be wholly representative of smaller institutions or those outside the UK. This specificity could mean that certain challenges or practices unique to smaller institutions remain unaddressed in our findings.

## Methodological Limitations:

The study's methodology, which combines manual content analysis with an index approach, is inherently vulnerable to interpretation biases. Additionally, the binary coding in disclosure indexes might not fully capture the complexities of modern slavery reporting, potentially simplifying the nuanced challenges faced by universities.

### Sample Limitations:

Our sample comprised 141 UK state universities, but seven of these institutions either failed to produce a required statement or did not respond to requests. Such non-responses might introduce biases that could slant the study's overall findings.

## Reliability Measures:

The intercoder reliability, while commendable at 89.39%, still suggests a possible divergence in interpretation among researchers. This 10.61% discrepancy underlines the subjective nature of certain elements of the research.

### **Quality Assessment Limitation:**

The criteria employed to distinguish between the "extent" and "quality" of compliance can be debated. It's worth noting that judgments about the "quality" of compliance might vary among experts.

### **Temporal Constraints:**

The research evaluates compliance post the introduction of the UK Modern Slavery Act 2015, reflecting a specific snapshot in time. As CSR reporting practices and associated regulations evolve, the insights drawn may need updates to remain relevant.

### **Regulatory Context:**

Our study leans heavily on the guidelines set by the UK Modern Slavery Act 2015, given the absence of a global framework. Hence, the findings might not fully align with practices in nations with different regulations.

#### **Data Source Limitation:**

Relying exclusively on published modern slavery statements might overlook some of the universities' behind-the-scenes efforts to combat modern slavery.

#### **Bias Considerations:**

Being under the spotlight, universities might craft their disclosures to appear more favorable, leading to potential over-representation of positive actions or downplaying challenges.

Dynamic Nature of Modern Slavery:

Modern slavery's evolving nature implies that certain emerging challenges might not be fully addressed in the current reporting practices of universities.

To further strengthen upcoming research, a more diverse array of data sources, like interviews with university administrators and surveys, could be beneficial. Moreover, widening the research scope to encompass institutions in other countries or of varying sizes might offer a more holistic understanding.

## 5.2. Future research

While our findings shed light on several crucial aspects of modern slavery reporting among UK state universities, there remain numerous facets and perspectives that need exploration. As we traverse this ever-evolving landscape, certain potential directions for future research emerge:

- Broader Geographical Scope: While this study focused on UK state universities, future
  research could expand geographically, encompassing institutions from other nations.
  Different countries have distinct cultural, legal, and socio-economic contexts that
  might influence reporting practices and challenges faced in addressing modern
  slavery.
- Diverse Institutional Sizes: A deeper look into how smaller educational institutions, both within and outside the UK, approach modern slavery can provide a more comprehensive picture. The challenges and resources available to smaller institutions might vary significantly from their larger counterparts.
- Qualitative Insights: Delving deeper into the reasons behind specific reporting practices through qualitative methods, such as in-depth interviews with university administrators and policymakers, can enrich our understanding.
- Stakeholder Perspectives: Considering the viewpoints of other stakeholders, like students, faculty, or local communities, can offer a multi-dimensional understanding of the issue. Their perceptions about universities' efforts, challenges, and successes can be illuminating.

- Dynamic Regulatory Landscape: As legal frameworks around modern slavery evolve globally, tracking these changes and assessing their impact on reporting practices can be crucial. Research could evaluate how new regulations influence institutional behaviors and disclosure standards.
- Internal Efforts: While published reports provide a wealth of information, exploring
  the unpublished initiatives and internal measures that universities undertake could be
  insightful. Surveys, internal document analyses, and informal conversations might
  uncover these unseen efforts.
- Comparative Analysis with Other Sectors: Comparing the modern slavery reporting
  practices of universities with those of other sectors, like the corporate world or nonprofits, might reveal unique challenges and best practices that can be adopted or
  adapted.
- Longitudinal Studies: Given the evolving nature of modern slavery and the dynamic regulatory landscape, longitudinal studies observing changes in reporting practices over extended periods can offer invaluable insights into trends and shifts.
- Educational Initiatives: Researching the efficacy of educational programs and awareness campaigns within universities concerning modern slavery could help understand their impact on both reporting and real-world practices.

In conclusion, while this study has endeavored to provide a comprehensive understanding of the current state of modern slavery reporting in UK state universities, the field is ripe for further exploration. Future research, building on this foundation and venturing into new territories, holds the promise of even deeper insights and more effective strategies to combat modern slavery.

## 6. Conclusion

Modern slavery, encompassing forced labor and trafficking, is increasingly prominent in today's global economy, impacting even esteemed institutions. Recognizing its role, the UK introduced the UK Modern Slavery Act 2015 to enhance transparency among corporations, including universities. This Act mandates organizations to disclose their anti-slavery measures.

This study revealed a disparity between compliance and in-depth reporting. Out of 141 UK universities analyzed, 128 produced statements in line with the Act. Yet, a detailed assessment indicates superficial compliance with the Act. Despite the Act's intentions:

Business Structures Disclosure: Universities, expected to be paragons of transparency, frequently offer quantitative but not qualitative data.

Policies Disclosure: Although universities have structured governance, there's a wide variance in their policy disclosures, often misaligned with the Act's specifics.

Due Diligence Disclosures: Many universities barely scratched the surface, especially regarding supply chain oversight, vital in countering modern slavery.

Risk Assessment: A significant void in risk assessment practices was observed. The lack of detailed assessments concerning third-party collaborations was evident.

Effectiveness: The reporting on anti-slavery initiatives' effectiveness was generally underwhelming, indicating a need for urgent redress.

Training: Despite their educational roles, universities' training disclosures about modern slavery were largely insufficient.

In answering the primary research question, while the UK Modern Slavery Act 2015 did propel UK universities towards recognizing modern slavery, its influence on comprehensive CSR reporting on the subject is debatable. The Act has triggered essential dialogue and basic compliance, but genuine, in-depth reporting remains a hurdle for many institutions.

Given universities' potential role as ethical standard-bearers, the gaps in their CSR reports highlight a broader challenge in modern slavery's battle. Meaningful change necessitates more than just adhering to the law. Clearer directives, proactive reporting, introspection, and collective action are the next steps.

As the modern slavery crisis intensifies globally, universities, under the guidance of the UK Modern Slavery Act 2015 and beyond, must lead through deeds and disclosures. This research attests to the advancements made while sounding an alarm for the path forward.

To summarize, this paper delves deep into modern slavery, its ramifications, and countermeasures, centering on UK universities' reporting practices under the UK Modern Slavery Act 2015. The research reveals the extent and quality of university disclosures on modern slavery, underlining improvement areas and pressing the necessity for superior reporting standards.

Modern slavery's global prevalence encompasses heinous practices like forced labor and trafficking, severely infringing on human rights. Large corporations, due to their expansive supply chains, often become inadvertent facilitators of these practices. Various regulatory frameworks have been introduced to enhance corporate transparency, but many corporations still lack comprehensive understanding and disclosures.

This research addresses a crucial gap, assessing how UK universities report on modern slavery in light of the UK Modern Slavery Act 2015. The Act offers foundational guidelines but might fall short in assisting institutions to enhance their slavery-related disclosures fully.

This investigation delves into the role of normativity in CSR reporting, scrutinizing factors influencing qualitative reporting, and the debate between voluntary and mandatory disclosures. Some propose stricter guidelines for detailed, qualitative reporting, while others suggest flexibility.

The UK Modern Slavery Act 2015, requiring businesses with turnovers exceeding £36 million to report on modern slavery, is integral to this discussion. The Act's limitations lie in its unspecific content guidelines and lack of mandates on corrective actions, leading to critiques about its comprehensiveness and effectiveness.

Using content analysis and an index approach, the study's methodology converts non-numerical information into quantifiable data for analysis. Focusing on 141 UK universities, the research evaluates compliance with the Act and the extent and quality of modern slavery statements.

Initial findings indicate substantial compliance by UK universities with the Act's base requirements. However, the quality and depth of disclosures vary, and several categories like risk assessments and effectiveness are underrepresented. Despite a commendable extent of business structures disclosures, there's a noticeable deficiency in policy disclosures and due diligence, revealing an overall superficial approach.

Moreover, the effectiveness of modern slavery statements is limited, signaling challenges in quantifying human rights impacts. The research identifies a significant lacuna in disclosures about modern slavery training programs.

In essence, this study emphasizes the need to enhance modern slavery disclosure standards among UK universities. Enhanced transparency, specific guidelines, and external collaborations can pave the way for this improvement. The research offers a valuable lens into the current state of modern slavery reporting, urging further exploration and action.

The UK Modern Slavery Act 2015, while instrumental in raising awareness, needs bolstering through detailed regulations, comprehensive audits, and educational support. This will not only improve compliance but also aid universities in effectively battling modern slavery.

In conclusion, while the UK Modern Slavery Act 2015 has been a positive step towards transparency, there's a pressing need for stronger practices to truly combat modern slavery. Universities, pivotal in this endeavor, must champion both compliance and proactive efforts, exemplifying global corporate responsibility.

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APPENDIX A: Overview of the universites compliance with the Act´s minimum requirements

University	Annual Statement (2021)	Declaration of steps taken	Approval by Board & signed off by director	Accessible on website	Structure	Policies	Due dilligence process	Risk assess ment	Performance indicators	Training	Total
Abertay University	1	1	0	1	1	1	1	1	0	1	8
Aberystwyth University	1	1	0	1	1	1	1	1	1	1	9
Anglia Ruskin University	1	1	1	1	1	1	1	1	1	1	10
Arden University	1	1	0	1	1	1	1	1	1	1	9
Aston University	1	1	1	1	1	1	1	1	1	1	10
Bangor University	1	1	1	1	1	1	1	0	0	1	8
Bath Spa University	1	1	0	1	1	1	1	1	0	1	8
BIMM University	1	1	1	1	1	1	0	1	0	1	8
Birmingham City											
University	1	1	0	1	1	1	1	1	0	1	8
Bishop Grosseteste		0	0	0	0	0	0	0	0	0	0
University	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	1	1	1	1	1	1	1	1	1	1	10
Brunel University London	1	1	0	1	1	1	1	1	0	0	7
Buckinghamshire New											
University	1	1	1	1	1	1	1	1	1	1	10
Canterbury Christ Church						_	_	_		4	•
University	1	1	0	1	1	1	1	1	1	1	9
Cardiff Metropolitan		1	0	1	1	1	1	1	1	1	0
University	1	1	0	l .	l .	l	l .	l .	l	1	9
Cardiff University	1	1	0	1	1	1	1	1	0	1	8
Coventry University	1	1	0	1	1	1	1	1	0	0	7
Cranfield University	1	1	1	1	1	1	1	1	0	0	8
De Montfort University	1	1	1	1	1	1	1	1	1	1	10
<b>Durham University</b>	1	1	0	1	1	1	0	1	0	1	7
Edge Hill University	1	1	0	1	1	1	1	1	1	1	9

Edinburgh Napier											
University	1	1	0	1	1	1	1	1	0	1	8
Falmouth University	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian											
University	1	1	0	1	1	1	1	1	1	1	9
Glasgow School of Art	1	1	1	1	1	1	1	1	0	1	9
Glyndŵr University	1	1	0	1	1	1	1	1	1	1	9
Harper Adams University	1	1	1	1	1	0	0	1	0	0	6
Hartpury University	1	•	•	·	•	· ·	· ·	·	· ·	· ·	· ·
Gloucester	0	1	1	1	1	1	1	1	1	1	9
Heriot-Watt University	1	1	0	1	1	1	1	1	1	1	9
Imperial College London	1	1	0	1	1	1	1	1	1	1	9
Kaplan International	1	•	· ·	·	•	•	·	·	·	·	•
College London	1	1	0	1	1	1	1	1	1	1	9
Keele University	1	1	0	1	1	1	1	1	0	1	8
King's College London	1	1	0	1	1	1	1	1	0	0	7
Kingston University	1	1	0	1	1	1	1	1	0	1	8
Lancaster University	1	1	0	1	1	1	1	1	1	1	9
Leeds Beckett University	1	1	1	1	1	1	1	1	0	1	9
Leeds Trinity University	1	1	0	1	1	1	1	1	1	1	9
Liverpool Hope University	1	1	0	1	1	1	1	1	0	1	8
Liverpool John Moores	1	•	· ·	·	•	•	·	·	· ·	·	J
University	1	1	1	1	1	1	1	1	0	1	9
Liverpool School of											
Tropical Medicine	1	1	1	1	1	1	1	1	1	1	10
London Metropolitan		4	•	4	4	4	4	4	•	4	0
University	1	1	0	1	1	1	1	1	0	1	8
London School of Economics and Political											
Science	1	1	0	1	1	1	1	1	1	1	9
London School of Hygiene	1	1	U	ı	ı	1	ı	1	ı	ı	7
and Tropical Medicine	1	1	1	1	1	1	1	1	0	1	9

London South Bank											
University	1	1	1	1	1	1	1	1	0	1	9
Loughborough University	1	1	0	1	1	1	1	1	0	1	8
Manchester Metropolitan											
University	1	1	1	1	1	1	1	1	0	1	9
Middlesex University	1	1	0	1	1	1	1	1	1	1	9
Newcastle University	1	1	0	1	1	1	1	1	1	1	9
Newman University	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	1	1	1	1	1	1	1	1	1	10
Nottingham Trent											
University	1	1	0	1	1	1	1	1	0	1	8
Oxford Brookes University	1	1	0	1	1	1	1	1	0	1	8
Plymouth Marjon											
University	1	1	0	1	1	1	1	1	0	1	8
Queen Margaret	1	1	0	1	1	1	1	1	0	1	0
University	1	l	0	1		l a	1	l a	0	l a	8
Queen Mary University	1	1	0	1	1	1	1	1	0	1	8
Queen's University Belfast	1	1	0	1	1	1	1	1	0	1	8
Ravensbourne University	0	0	0	0	0	0	0	0	0	0	0
London	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	0	1	1	1	1	1	1	1	0	1	8
Regents Theological	U	ı		'	Į.	· ·	Į.	Į.	U	'	O
College	1	1	1	1	1	1	1	1	0	1	9
Robert Gordon University	1	1	0	1	1	1	1	1	1	1	9
Roehampton University	1	1	1	1	1	1	1	1	0	1	9
Royal College of Art	1	1	1	1	1	1	1	1	0	1	9
Royal Holloway and	1	•	•	·		•	•	•	G		,
Bedford New College	1	1	1	1	1	1	1	1	0	1	9
Sheffield Hallam											
University	1	1	1	1	1	1	1	1	1	1	10
Solent University	1	1	0	1	1	1	1	1	0	1	8

SRUC Aberdeen	1	1	1	1	1	1	1	1	0	1	9
St Mary's University	1	1	0	1	1	1	1	1	0	1	8
Staffordshire University	1	1	0	1	1	1	1	1	0	1	8
Swansea University	1	1	0	1	1	1	1	1	0	1	8
Teesside University	1	1	0	1	1	1	1	1	1	1	9
The Arts University Bournemouth	1	1	0	1	1	1	1	1	1	1	9
The Open University	1	1	0	1	1	1	1	0	0	1	7
The Royal Veterinary College	1	1	0	1	1	1	1	1	1	1	9
Ulster University	1	1	1	1	1	1	1	1	1	1	10
University College Birmingham	1	1	1	1	0	1	0	1	0	0	6
University College London	1	1	1	1	1	1	1	1	1	1	10
University for the Creative Arts	1	1	1	1	1	1	1	1	0	1	9
University of Aberdeen	1	1	0	1	1	1	1	0	0	1	7
University of Bath	1	1	1	1	1	1	1	0	0	1	8
University of Bedfordshire	0	1	1	1	1	1	1	0	0	1	7
University of Birmingham	1	1	0	1	0	1	0	0	0	0	4
University of Bolton	1	1	1	1	1	1	1	1	1	1	10
University of Bradford	1	1	1	1	1	1	1	1	1	1	10
University of Brighton	1	1	1	1	1	1	0	0	0	0	6
University of Bristol	1	1	1	1	1	1	1	1	1	1	10
University of Cambridge	1	1	1	1	1	1	1	0	0	1	8
University of Central Lancashire	1	1	1	1	1	1	1	1	1	1	10
University of Chester	1	1	1	1	1	1	1	1	1	1	10
University of Chichester	1	1	0	1	1	1	0	0	0	0	5
University of Cumbria	1	1	1	1	1	1	1	1	1	1	10

University of Derby	1	1	1	1	1	1	1	1	1	1	10
University of Dundee	1	1	0	1	1	1	1	0	0	1	7
University of East Anglia	1	1	1	1	1	1	1	1	1	1	10
University of East London	1	1	0	1	1	1	0	0	1	1	7
University of Edinburgh	1	1	1	1	1	1	1	1	1	1	10
University of Essex	1	1	0	1	1	1	0	1	0	0	6
University of Exeter	0	1	1	1	1	1	1	1	1	1	9
University of Glasgow	1	1	1	1	1	1	0	1	1	1	9
University of Gloucestershire	1	1	1	1	1	1	0	1	0	1	8
University of Greenwich	1	1	1	1	1	1	1	0	0	1	8
University of Hertfordshire	1	1	1	1	1	1	1	1	1	1	10
University of Huddersfield	1	1	1	1	1	1	1	1	0	1	9
University of Hull	1	1	0	1	1	1	0	1	1	1	8
University of Kent	0	1	1	1	1	1	1	1	0	1	8
University of Leeds	1	1	0	1	1	1	0	1	0	1	7
University of Leicester	1	1	0	1	1	1	1	1	1	1	9
University of Lincoln	1	1	1	1	1	1	0	0	0	0	6
University of Liverpool	1	1	0	1	1	1	1	1	0	1	8
University of London	1	1	1	1	1	1	1	1	1	1	10
University of Manchester	1	1	0	1	1	1	1	1	0	1	8
University of Northampton	1	1	1	1	1	1	1	1	1	1	10
University of Nottingham	1	1	1	1	1	1	1	1	1	1	10
University of Oxford	1	1	1	1	1	1	1	1	1	1	10
University of Plymouth	1	1	0	1	1	1	0	1	0	0	6
University of Portsmouth	1	1	0	1	1	1	0	1	0	0	6
University of Reading	1	1	1	1	1	1	1	1	0	1	9
University of Salford	1	1	1	1	1	1	1	1	1	1	10
University of Sheffield	1	1	1	1	1	1	1	1	0	1	9

University of South Wales	1	1	1	1	1	1	1	1	1	1	10
University of Southampton	0	1	0	1	1	1	1	0	0	0	5
University of St Andrews	1	1	1	1	1	1	0	1	0	0	7
University of Stirling	1	1	0	1	1	1	1	1	0	0	7
University of Strathclyde	1	1	1	1	1	1	1	1	1	1	10
University of Suffolk	1	1	1	1	1	1	1	1	0	0	8
University of Sunderland	0	1	0	1	1	1	1	1	0	1	7
University of Surrey	1	1	1	1	1	1	0	1	1	1	9
University of Sussex	1	1	1	1	1	1	0	1	0	1	8
University of the Arts London	1	1	1	1	1	1	1	1	0	1	9
University of the Highlands & Islands	0	1	0	1	1	1	1	1	1	1	8
University of the West of England	1	1	1	1	1	1	0	1	0	1	8
University of the West of Scotland	1	1	1	1	1	1	1	1	1	1	10
University of Wales	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	1	1	1	1	1	1	1	0	1	9
University of Warwick	1	1	0	1	1	1	0	1	0	1	7
University of West London	1	1	0	1	1	1	1	1	0	1	8
University of Westminster	1	1	1	1	1	1	1	1	0	1	9
University of Winchester	1	1	0	1	1	1	1	1	0	0	7
University of Wolverhampton	1	1	0	1	1	1	1	1	1	1	9
University of Worcester	1	1	0	1	1	1	1	1	0	1	8
University of York	1	1	0	1	1	1	1	1	1	1	9
York St John University	1	1	1	1	1	1	0	1	0	1	8

APPENDIX B: Overview of the universities, which have been considered in this study and general information.

Category	Subtheme #	Subthemes	Description
	1	Sectors and business	Products, services and customers served and whether suppliers change on a seasonal basis
	2	Structure and group relationships	Parent company and subsidiaries including outside the UK; The organizational structure and group relationships
Business	3	Source countries	Location of operations by country and products, services, parts and raw materials that it procures, and it classifies them by sourcing country. The countries it sources its goods or services from including high risk countries where modern forms of slavery are prevalent
structure	4	Supply chains	The names and countries (or addresses) of its tier 1 suppliers (defined as those suppliers with whom the company has a direct contractual relationship)
	5	Location of operations	Locations of operations (by country)
	6	Relationship with suppliers	Relationship with suppliers
	7	Workforce composition	Number of direct employees, number of workers represented by trade union or other worker organisation, contractors, agency, outsourced, temporary, seasonal
	8	Human rights leadership	Leadership responsible for human rights strategy, including modern slavery
	9	Policy development, implementation and enforcement leadership	Leadership, committees, departments or officers responsible for policy development, implementation and enforcement related to human rights and/or modern slavery
Policies	10	Expert stakeholders	Consultation with expert stakeholders in developing or reviewing its human rights policies, which include modern slavery (e.g. withholding wages or imposing recruitment fees or other expenses)
	11	Internal policies	Internal policies and how they relate to modern slavery
	12	Supplier policies	Relevant policies for suppliers and business partners,- and how they relate to modern slavery; procurement policy

	13	Recruitment policies	The company discloses its relevant policies for recruitment
	14	International standards	Recognised in its relevant internal and external policies, or aligns them with such standards; human rights standards, core ILO labour rights or the UN Guiding Principles on Business and Human Rights
	15	Availability	Policies publicly available & disseminated to all workers, students, alumni, business partners and other parties
	16	Mechanism	Mechanisms used to monitor compliance with policies and standards
	17	Non-compliance process	Processes undertaken when noting non- compliance.
	18	Financial burdens	Prohibition of the imposition of any financial burdens (e.g. withholding wages or imposing recruitment fees or other expenses) on workers in its own operations, suppliers, and recruitment agencies
	19	Pre-assessment	Assessments of forced labour/ modern slavery risks before entering contracts with suppliers (e.g., charging recruitment fees or other costs, withholding of wages, retention of passports/ personal identification)
	20	Contract provisions	Provisions related to modern slavery risk factors in supplier contracts
	21	Supplier associations	Working with suppliers to improve their labour rights practices (e.g., freedom of association and collective bargaining, freedom of movement, living wage); freedom of association and collective bargaining (in the supply chain) (agriculture); Workforce wellbeing and engagement
Due Dilligence	22	First tier supplier cascade	Requiring first tier suppliers to cascade the company's human rights and modern slavery standards down their own supply chains
	23	Supplier monitoring	Monitoring suppliers on modern slavery and other labour rights issues and discloses results of those monitoring processes (e.g., audits, site visits)
	24	Stakeholder monitoring	Participation in multi-stakeholder collaborations or industry initiatives related to human rights or modern slavery and provides details of participation (more than passive membership).
	25	Workers in supplier engagement	Direct engagement with workers in the supply chain, such as interviews with workers as part of monitoring processes or

			site visits; commitment to engage with stakeholders
	26	Grievance mechanism	Availability of grievance mechanism(s) (its own, third party or shared) to all workers to raise human rights related complaints/ concerns (including labour conditions) without retaliation, support whislte-blowing, facilitate reporting including reporting by workers through helplines; Grievance channel(s)/mechanism (s) to receive complaints or concerns from workers; Commitment to non-retaliation over complaints or concerns made
	27	Grievance mechanism in suppliers	Expecting suppliers to establish a mechanism(s) for workers to raise complaints/concerns, including about human rights issues, and communicates this expectation to its suppliers
	28	Upcoming actions	Specific actions taken in the upcoming financial year to address modern slavery and human trafficking issues and progress made on actions committed to in previous year's statement
	29	Corrective action plans	Mentions of corrective action plans and explanations of how they have been implemented and/or remedy has been provided, such as record review, employee interviews, spotchecks or other means; commitment to remedy, integrating assessment findings internally and taking appropriate action, remedying adverse impacts and incorporating lessons learned
	30	Risk assessment statement	Undertaking a risk assessment, which includes modern slavery risks, in its own business
	31	Details of risk assessment	Details of how the risk assessment of its operations was carried out, including what indicators, resources, tools were used.
Risk assessment	32	Traceability	Mapping supply chains or business relationships and identification of areas of high risk.
	33	Suppliers risk assessment	Undertaking a risk assessment that includes modern slavery in its supply chain or other business relationshis
	34	Details of supplier's risk assessment	Details on how the risk assessment of its supply chain was carried out including what indicators, resources, tools were used

	35	Stakeholder engagement	Consultation with potentially affected rights holders when developing or carrying out a risk assessment
	36	Expert engagement	Seeking input from expert stakeholders (e.g. internal departments, local NGOs, trade unions) when developing and/or undertaking internal or external assessments
	37	Country risks	The company discloses priority areas for action in its operations and supply chains based on risks identified in assessments
	38	Transaction risks	Facilitating financing from or supporting cases of modern slavery and bonded labour in operations and supply chains or through money laundering (usual in financial institutions)
	39	Business partnership risks	Mapping supply chain or business relationships and identification of areas of high risk
	40	Priority areas	Priority areas for action in its operations and supply chains based on risks identified in assessments
	41	Measurement method	Explicit key performance indicators or other methods used to measure the effectiveness of efforts to address modern slavery risks, with rationale for each KPI
	42	Results of measurement	Results of KPIs or other practices it has in place in relation to item 41
	43	Business decisions by the results	Description of if and how business decisions are informed by the results of such methods in relation to item 41
	44	Reviews progress against KPIs & revises	Reviewing progress against KPIs & revises if necessary
Effectiveness	45	Expert stakeholders	KPIs or other metrics developed in collaboration with expert stakeholders (e.g., internal departments, NGOs, consultants)
	46	Results of corrective action plans	Results of corrective actions plans for risks of modern slavery identified in the risk assessment, audits or in some other manner
	47	Results of grievances	Grievances/allegations related to modern slavery or labour rights received/identified, if any, and the results of action plans implemented to resolve those complaints or potential outcomes in case of no grievance/allegations
	48	Review of existing KPIs	Review of existing KPIs to determine whether they make business and supply chain vulnerable to modern slavery

	49	Training on company policies and standards	Provision of training on company policies and standards related to modern slavery risks to relevant personnel including leadership (e.g., human resources, legal, compliance, sourcing, recruitment, purchasing)
	50	Bespoke training	Provision of bespoke training for target audiences related to modern slavery risks they are likely to encounter
	51	Supplier training	Provision of training and capacity building to suppliers on risks, policies, and standards related to modern slavery and human trafficking
	32	Encouraging suppliers	Encouraging suppliers to provide training to its employees and suppliers on modern slavery
Training	53	Training plans	Training plans including who will receive trainings on modern slavery (e.g., to certain group of employees, suppliers)
	54	Training format	Description of the format in which the training is provided (e.g., in-person instruction, video, pamphlet)
	55	External experts	Development or delivery of training in partnership with internal or external experts (experts are identified in statement)
	56	Frequency	Description of how often modern slavery training is provided (e.g., quarterly, annually, refresher courses)
	57	Performance	Evaluating the effectiveness of training provided to employees (e.g. on whether recipiens understood the purpose of the training such as how to identify modern slavery risks

Quelle: Mai et al., 2022

## APPENDIX C: Extent and quality of the modern slavery statements of UK universities per reporting category

University - Business structure Narrative (N), Quantitative (Q), Qualitative (QI)	Sectors and business		Structure and group relationships		Source countries		Supply chains		Location of operations		Relationship with suppliers		Workforce composition		Total score	
Qualitative (QI)	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	QI
Abertay University	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1
Aberystwyth University	1	0	0	0	0	0	1	1	0	0	1	0	0	0	3	4
Anglia Ruskin University	1	0	1	0	0	0	1	1	0	0	1	0	0	0	4	5
Arden University	1	1	0	0	1	0	0	0	1	0	0	0	0	0	3	4
Aston University	1	1	0	0	1	0	0	0	1	0	0	0	0	0	3	4
Bangor University	1	1	1	1	0	0	1	1	0	0	0	0	0	0	3	6
Bath Spa University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
BIMM University	1	0	1	0	0	0	1	0	1	0	0	0	1	0	5	5
Birmingham City University	1	1	0	0	0	0	1	1	0	0	0	0	0	0	2	4
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Bournemouth University</b>	1	0	1	0	0	0	1	1	0	0	0	0	0	0	3	4
Brunel University London	1	0	1	0	1	0	1	1	1	0	1	0	0	0	6	7
Buckinghamshire New University	1	1	1	0	0	0	0	0	0	0	1	0	1	0	4	5
Canterbury Christ Church University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cardiff Metropolitan University	1	0	0	0	1	0	1	0	1	0	0	0	1	1	5	6
Cardiff University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	2	2
Coventry University	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1
Cranfield University	1	1	0	0	0	0	1	0	0	0	0	0	1	0	3	4
De Montfort University	1	1	1	0	0	0	1	0	0	0	0	0	0	0	3	4
Durham University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	4	4
Edge Hill University	1	1	0	0	0	0	1	0	0	0	0	0	1	1	3	5
Edinburgh Napier University	1	1	1	0	0	0	0	0	0	0	0	0	0	0	2	3
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	1	1	0	0	0	0	1	0	0	0	0	0	1	0	3	4
Glasgow School of Art	0	0	0	0	1	0	1	0	1	0	1	1	1	0	5	6
Glyndŵr University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2	2
Harper Adams University	1	0	0	0	0	0	1	0	0	0	1	0	0	0	3	3
Hartpury University Gloucester	1	0	0	0	1	0	1	1	1	0	1	0	1	1	6	8
Heriot-Watt University	1	0	1	0	1	0	1	0	1	0	1	0	0	0	6	6
Imperial College London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Kaplan International College London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Keele University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	4	4

King's College London	1	1	1	0	0	0	0	0	0	0	0	0	0	0	2	3
Kingston University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Lancaster University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Leeds Beckett University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Leeds Trinity University	1	1	1	0	0	0	1	0	1	0	1	0	1	0	6	7
Liverpool Hope University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	6	6
Liverpool John Moores University	1	1	1	0	1	0	1	0	1	0	1	1	1	0	7	9
Liverpool School of Tropical Medicine	1	1	1	0	1	0	1	0	1	0	1	0	1	0	7	8
London Metropolitan University	1	0	1	0	1	1	1	0	1	0	1	0	0	0	6	7
London School of Economics and Political Science	1	0	1	0	1	0	1	0	1	0	1	1	1	0	7	8
London School of Hygiene and Tropical Medicine	1	1	1	0	1	0	1	0	1	0	1	0	1	0	7	8
London South Bank University	1	0	1	0	1	0	1	0	1	0	1	0	0	0	6	6
Loughborough University	1	1	1	0	0	0	1	0	0	0	1	0	0	0	4	5
Manchester Metropolitan University	1	1	1	0	0	0	1	1	1	0	0	0	0	0	4	6
Middlesex University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	5	5
Newcastle University	1	1	1	0	1	0	1	1	1	0	1	1	1	0	7	10
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	1	1	0	1	0	1	0	1	0	1	0	1	0	7	8
Nottingham Trent University	1	1	1	0	0	0	1	0	0	0	1	0	0	0	4	5
Oxford Brookes University	1	0	0	0	0	0	1	0	1	0	1	0	0	0	4	4
Plymouth Marjon University	1	1	1	0	0	0	1	1	1	0	1	0	1	0	6	8
Queen Margaret University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	7	7
Queen Mary University	1	1	1	0	0	0	1	0	1	0	1	1	0	0	5	7
Queen's University Belfast	1	0	1	0	1	0	1	0	1	0	1	0	0	0	6	6
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	1	1	1	0	1	0	1	0	1	0	1	0	1	1	7	9
Regents Theological College	0	0	1	0	0	0	1	0	1	0	1	0	0	0	4	4
Robert Gordon University	1	1	1	0	0	0	1	0	0	0	1	1	0	0	4	6
Roehampton University	1	1	1	1	0	0	1	0	1	1	1	0	0	0	5	8
Royal College of Art	1	1	1	0	0	0	1	0	1	0	1	0	0	0	5	6
Royal Holloway and Bedford New College	1	1	1	0	1	0	1	0	1	0	1	0	0	0	6	7
Sheffield Hallam University	1	1	1	0	0	0	1	0	0	0	1	0	0	0	4	5
Solent University	1	1	1	0	0	0	1	0	1	0	1	0	0	0	5	6
SRUC Aberdeen	1	1	1	0	1	0	1	0	1	0	1	0	0	0	6	7
St Mary's University	1	1	1	0	1	0	1	0	1	0	1	0	1	0	7	8
Staffordshire University	1	1	1	0	0	0	1	0	0	0	1	0	0	0	4	5
Swansea University	1	0	0	0	0	0	1	1	0	0	1	1	0	0	3	5
Teesside University	1	1	1	1	0	0	1	1	1	1	1	1	1	0	6	11
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The Arts University Bournemouth	1	1	1	1	1	0	1	0	0	0	1	1	1	1	6	10
The Open University	1	1	1	0	0	0	1	0	1	0	0	0	1	0	5	6
The Royal Veterinary College	1	1	1	1	0	0	1	0	0	0	1	0	1	0	5	7
Ulster University	1	1	1	1	1	1	1	0	1	0	1	1	1	0	7	11
University College Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University College London	1	1	1	1	1	1	1	1	1	1	1	0	1	0	7	12
University for the Creative Arts	1	0	1	1	1	1	0	0	1	1	1	0	1	0	6	9
University of Aberdeen	1	0	1	0	0	0	1	0	1	0	1	0	1	0	6	6
University of Bath	1	1	1	1	1	0	1	0	1	0	0	0	1	0	6	8
University of Bedfordshire	1	0	1	0	0	0	1	1	1	0	0	0	1	0	5	6
University of Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bolton	1	1	1	1	1	1	1	0	1	1	1	0	1	0	7	11
University of Bradford	1	1	1	1	1	0	1	1	1	0	1	0	1	0	7	10
University of Brighton	1	0	1	0	0	0	1	0	0	0	0	0	1	1	4	5
University of Bristol	1	1	1	1	0	0	1	0	1	0	1	0	1	1	6	9
University of Cambridge	1	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Central Lancashire	1	1	1	0	0	0	1	1	1	1	1	0	1	1	6	10
University of Chester	1	1	1	1	1	0	1	1	1	0	1	1	1	1	7	12
University of Chichester	1	0	1	0	1	0	1	0	1	0	1	0	0	0	6	6
University of Cumbria	1	1	1	0	0	0	1	1	0	0	1	0	1	1	5	8
University of Derby	1	1	1	0	0	0	1	1	0	0	1	1	1	1	5	9
University of Dundee	1	0	0	0	0	0	0	0	0	0	1	0	1	0	3	3
University of East Anglia	1	1	1	1	0	0	1	0	0	0	1	0	1	0	5	7
University of East London	1	1	1	1	0	0	1	1	1	0	1	1	1	0	6	10
University of Edinburgh	1	1	1	1	1	1	1	1	1	1	1	0	1	1	7	13
University of Essex	1	1	1	0	1	1	1	0	1	1	1	1	1	0	7	11
University of Exeter	1	0	1	0	0	0	0	0	0	0	0	0	1	1	3	4
University of Glasgow	1	1	1	1	1	1	1	0	1	1	1	0	1	1	7	12
University of Gloucestershire	1	0	1	1	0	0	1	0	1	1	1	0	1	0	6	8
University of Greenwich	1	1	1	0	0	0	1	1	1	0	1	0	1	0	6	8
University of Hertfordshire	1	1	1	0	0	0	1	1	1	0	1	0	1	0	6	8
University of Huddersfield	1	1	1	1	0	0	1	1	1	1	1	0	1	1	6	11
University of Hull	1	1	1	0	0	0	1	1	1	1	1	0	1	1	6	10
University of Kent	1	0	1	0	0	0	1	0	0	0	1	0	1	0	5	5
University of Leeds	1	1	1	0	1	0	1	1	1	1	1	0	1	1	7	11
University of Leicester	1	1	1	1	0	0	1	1	1	1	1	0	1	1	6	11
University of Lincoln	1	1	1	0	0	0	1	0	0	0	1	0	1	1	5	7
University of Liverpool	1	1	1	0	0	0	1	0	0	0	1	0	1	1	5	7
University of London	1	1	1	0	0	0	1	1	0	0	1	0	1	1	5	8
University of Manchester	1	1	1	0	0	0	1	0	1	0	1	0	1	1	6	8

University of Northampton	1	0	1	1	0	0	1	1	1	1	1	0	1	1	6	10
University of Nottingham	1	1	1	1	1	0	1	1	1	1	1	1	1	1	7	13
University of Oxford	1	1	1	1	1	1	1	1	1	0	1	1	1	1	7	13
University of Plymouth	1	0	0	1	0	0	1	0	0	0	1	0	1	0	4	5
University of Portsmouth	1	1	1	0	1	0	1	1	1	1	1	0	1	1	7	11
University of Reading	1	1	1	0	0	0	1	1	1	1	1	0	1	1	6	10
University of Salford	1	1	1	0	0	0	1	0	1	0	1	0	1	1	6	8
University of Sheffield	1	0	1	0	0	0	1	1	1	0	1	0	1	0	6	7
University of South Wales	1	1	1	1	0	0	1	1	1	1	1	0	1	1	6	11
University of Southampton	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2	2
University of St Andrews	1	0	1	0	0	0	1	1	1	0	1	0	0	0	5	6
University of Stirling	1	0	0	0	0	0	1	0	0	0	0	0	1	0	3	3
University of Strathclyde	1	1	1	0	0	0	1	1	1	1	1	0	1	0	6	9
University of Suffolk	1	0	0	0	0	0	1	0	0	0	1	0	0	0	3	3
University of Sunderland	1	1	1	0	0	0	1	0	0	0	1	0	1	1	5	7
University of Surrey	1	0	1	0	0	0	1	1	1	1	0	0	1	1	5	8
University of Sussex	1	1	1	0	0	0	1	1	1	1	1	0	1	1	6	10
University of the Arts London	1	1	1	0	0	0	1	0	0	0	1	0	1	1	5	7
University of the Highlands & Islands	1	1	1	0	0	0	1	1	1	1	1	1	1	1	6	11
University of the West of England	1	0	1	0	0	0	1	1	0	0	1	0	1	0	5	6
University of the West of Scotland	1	0	1	0	0	0	1	1	1	1	1	0	1	0	6	8
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	0	1	1	0	0	1	1	1	1	1	0	1	1	6	10
University of Warwick	1	0	1	0	0	0	1	1	1	1	1	0	1	1	6	9
University of West London	1	0	1	0	1	0	1	0	1	1	1	0	1	0	7	8
University of Westminster	1	0	1	0	0	0	1	0	1	1	1	0	1	1	6	8
University of Winchester	1	1	1	1	1	0	1	0	1	1	1	0	1	0	7	10
University of Wolverhampton	1	0	1	1	0	0	1	0	0	0	1	0	1	1	5	7
University of Worcester	1	0	1	0	1	0	1	1	1	1	1	0	1	1	7	10
University of York	1	1	1	0	1	1	1	1	1	1	1	0	1	1	7	12
York St John University	1	0	1	0	0	0	1	0	1	0	1	1	1	1	6	8

University - Policies Narrative (N), Quantitative (Q), Qualitative (QI)	Hum righ leade	nts	Pol develop implement and enfo leade	pment, entation rcement	Exp stakeh	ert olders	Inte poli	rnal	Sup poli			itment icies	Interna stand		Availa	bility	Mech	anism	comp	on- liance cess	Finan burd		Pr assess		Tot sco	
	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	QI
Abertay University	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
Aberystwyth University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	5	5
Anglia Ruskin University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	1	1	7	8
Arden University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	4	4
Aston University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	4	4
Bangor University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	6	6
Bath Spa University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
BIMM University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	5	5
Birmingham City University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	4	4
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	5	5
Brunel University London	1	0	1	0	0	0	1	0	1	0	0	1	0	0	1	0	1	0	0	0	1	1	0	0	7	9
Buckinghamshire New University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	7	7
Canterbury Christ Church University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4
Cardiff Metropolitan University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	7	7
Cardiff University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	7	7
Coventry University	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
Cranfield University	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
De Montfort University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Durham University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Edge Hill University	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Edinburgh Napier University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	5	5
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	7	7
Glasgow School of Art	1	0	1	0	0	0	1	0	1	1	1	0	1	0	0	0	1	0	1	0	0	0	0	0	8	9
Glyndŵr University	0	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Harper Adams University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hartpury University Gloucester	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Heriot-Watt University	0	0	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Imperial College London	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Kaplan International College London	1	0	1	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	6	6
Keele University	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	6	6
King's College London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	5	5

Kingston University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Lancaster University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Leeds Beckett University	0	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	5	5
Leeds Trinity University	1	0	1	0	0	0	1	1	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	9	10
Liverpool Hope University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	1	0	8	8
Liverpool John Moores University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	8	8
Liverpool School of Tropical Medicine	1	0	1	1	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	0	0	1	1	11	14
London Metropolitan University	1	0	1	0	0	0	1	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	6	7
London School of Economics and Political Science	1	0	1	0	1	0	1	1	1	1	1	0	1	0	0	0	1	0	1	0	0	0	1	0	10	12
London School of Hygiene and Tropical Medicine	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	6	6
London South Bank University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	6	6
Loughborough University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	7	7
Manchester Metropolitan University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	7	7
Middlesex University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4
Newcastle University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	10	10
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	0	1	0	1	0	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	1	1	12	14
Nottingham Trent University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	6	6
Oxford Brookes University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	1	0	8	8
Plymouth Marjon University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	1	0	9	9
Queen Margaret University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	6	6
Queen Mary University	1	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	6	6
Queen's University Belfast	1	0	1	0	1	0	1	1	1	1	1	1	1	0	0	0	0	0	1	0	0	0	1	0	9	12
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	1	0	1	0	0	0	1	1	1	0	1	1	0	0	1	1	1	1	1	1	0	0	0	0	8	13
Regents Theological College	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	5	5
Robert Gordon University	1	0	1	1	1	0	1	1	1	0	1	1	1	0	0	0	0	0	1	0	0	0	0	0	8	11
Roehampton University	1	1	1	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	9	10
Royal College of Art	1	0	1	0	0	0	1	0	1	0	1	0	1	1	0	0	0	0	1	0	0	0	1	0	8	9
Royal Holloway and Bedford New College	1	1	1	1	1	0	1	1	1	1	1	0	1	0	1	0	1	0	1	0	0	0	0	0	10	14
Sheffield Hallam University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	8	8
Solent University	1	1	1	0	0	0	1	1	1	0	1	0	1	0	1	1	1	1	1	1	0	0	1	1	10	16
SRUC Aberdeen	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	1	0	11	11
St Mary's University	1	0	1	0	1	0	1	0	1	0	1	1	1	0	0	0	0	0	0	0	0	0	1	0	8	9
Staffordshire University	0	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	6	6
Swansea University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	9	9
Teesside University	1	0	1	1	0	0	1	1	1	1	1	0	1	0	0	0	0	0	0	0	0	0	1	1	7	11
The Arts University Bournemouth	1	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	7	7

The Open University	0	0	1	0	0	Ο	1	0	1	0	1	0	1	0	0	٥	1	0	1	Ο	0	0	0	0	7	7
The Royal Veterinary College	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	8	8
Ulster University	1	0	1	0	0	0	1	0	1	0	0	0	1	0	1	1	1	1	0	0	1	0	1	1	-	12
University College Birmingham	1	0	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	5	5
University College London	1	1	1	1	1	0	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	0	1	0	12	
University for the Creative Arts	1	0	1	0	0	0	1	1	1	1	1	1	1	0	1	1	0	0	1	0	0	0	1	0		13
University of Aberdeen	1	0	0	0	0	0	1	0	1	0	0	0	1	1	1	1	1	0	1	0	0	0	1	0		10
University of Bath	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	0	1	1	1	0	12	
University of Bedfordshire	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Birmingham	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	3
University of Bolton	1	1	1	0	1	1	1	0	1	1	1	1	1	1	1	1	1	0	1	0	1	1	1	1	12	
University of Bradford	1	1	1	0	0	0	1	1	1	0	1	0	1	0	1	0	1	0	1	1	1	0	1	1		15
University of Brighton	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	3	3
University of Bristol	1	0	1	0	1	1	1	0	1	1	0	0	1	0	1	1	1	0	0	0	0	0	0	0	8	11
University of Cambridge	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	5	5
University of Central Lancashire	1	0	1	0	0	0	1	1	1	1	1	0	1	1	1	1	1	1	1	0	0	0	0	0	9	14
University of Chester	1	1	1	0	0	0	1	1	0	0	0	0	1	0	1	1	1	0	0	0	0	0	1	0	7	10
University of Chichester	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0	0	0	5	6
University of Cumbria	1	1	1	0	1	0	1	1	1	0	0	0	1	1	1	0	1	1	1	1	1	0	0	0	10	15
University of Derby	1	0	1	0	0	0	1	0	0	0	1	0	1	1	0	0	1	0	0	0	0	0	0	0		7
University of Dundee	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	3	3
University of East Anglia	1	0	0	0	0	0	0	1	1	0	1	0	1	1	1	0	1	0	0	0	1	0	1	0	8	10
University of East London	1	0	1	0	0	0	1	1	1	0	1	0	1	1	1	0	1	0	0	0	0	0	1	0	9	11
University of Edinburgh	1	1	1	1	1	0	1	1	1	1	1	0	1	1	1	1	1	0	1	1	0	0	1	0	11	18
University of Essex	1	1	1	0	0	0	1	0	1	0	1	0	1	1	1	0	1	0	0	0	0	0	1	0	9	11
University of Exeter	1	0	1	0	0	0	1	1	1	0	1	0	1	1	1	1	1	0	1	1	0	0	0	0	9	13
University of Glasgow	1	0	1	1	0	0	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	0	1	0	11	18
University of Gloucestershire	1	0	1	0	0	0	1	1	1	0	1	0	1	1	1	0	0	0	0	0	0	0	0	0	7	9
University of Greenwich	1	0	1	1	0	0	1	1	1	0	0	0	0	0	0	0	1	0	0	0	1	0	1	0	7	9
University of Hertfordshire	1	0	1	1	0	0	1	0	1	1	1	0	1	0	1	1	1	0	0	0	0	0	0	0	8	11
University of Huddersfield	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	1	0	0	0	0	0	0	0	0	7	8
University of Hull	1	0	0	0	0	0	1	0	1	0	0	0	1	1	1	1	1	0	0	0	0	0	0	0	6	8
University of Kent	1	0	1	0	1	0	1	1	1	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	7	10
University of Leeds	1	1	1	0	0	0	1	1	1	0	0	0	1	0	1	1	1	0	1	0	0	0	0	0	8	11
University of Leicester	1	1	1	0	0	0	1	1	1	0	0	0	1	1	1	1	1	0	0	0	0	0	0	0	7	11
University of Lincoln	1	1	1	0	0	0	1	1	1	0	1	0	1	1	1	1	0	0	0	0	0	0	1	0	8	12
University of Liverpool	1	0	1	0	0	0	1	0	1	1	0	0	1	0	1	1	0	0	0	0	0	0	0	0	6	8
University of London	1	1	1	0	0	0	1	1	1	0	1	0	1	1	1	1	1	0	1	0	0	0	1	1	10	15
University of Manchester	1	1	1	0	1	0	1	1	1	1	1	0	1	1	1	1	1	0	0	0	1	0	1	0	11	16

University of Northampton	1	0	1	1	1	0	1	0	1	1	1	0	1	1	1	1	1	0	0	0	0	0	0	0	9	13
University of Nottingham	1	1	1	1	1	0	1	1	1	1	1	1	1	1	1	1	1	0	1	0	1	0	1	1	12	20
University of Oxford	1	0	1	0	1	0	1	1	1	1	1	0	1	1	1	1	0	0	1	0	0	0	1	0	10	14
University of Plymouth	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	4	4
University of Portsmouth	1	0	0	0	0	0	1	1	1	0	1	1	1	1	1	1	0	0	1	0	0	0	0	0	7	11
University of Reading	1	0	1	1	0	0	1	1	1	0	1	0	1	1	1	1	0	0	0	0	0	0	0	0	7	11
University of Salford	1	1	1	0	0	0	1	1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	7	9
University of Sheffield	1	0	1	0	0	0	1	1	0	0	1	0	1	0	1	1	0	0	0	0	0	0	1	0	7	9
University of South Wales	1	0	1	1	0	0	1	1	1	0	1	1	1	1	1	1	0	0	1	0	0	0	1	0	9	14
University of Southampton	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of St Andrews	1	0	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	5	5
University of Stirling	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	3	3
University of Strathclyde	1	0	1	1	0	0	1	1	1	0	1	0	1	1	1	0	1	1	1	0	1	0	1	0	11	15
University of Suffolk	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Sunderland	1	0	0	0	0	0	1	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	3	5
University of Surrey	1	0	1	0	0	0	1	1	0	0	0	0	1	0	1	1	0	0	0	0	0	0	1	0	6	8
University of Sussex	1	0	1	0	0	0	1	1	1	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	6	9
University of the Arts London	1	0	1	0	0	0	1	0	1	0	1	0	1	1	1	0	0	0	0	0	0	0	0	0	7	8
University of the Highlands & Islands	1	1	1	0	1	0	1	1	1	1	1	0	1	1	1	1	1	0	0	0	1	0	1	0	11	16
University of the West of England	1	0	1	0	0	0	1	1	1	0	1	0	1	0	1	1	1	0	0	0	0	0	0	0	8	10
University of the West of Scotland	1	1	1	0	0	0	1	1	1	0	1	0	1	1	1	1	0	0	0	0	0	0	0	0	7	11
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	0	0	0	0	0	1	0	1	0	0	0	1	0	1	1	1	0	0	0	0	0	0	0	6	7
University of Warwick	1	0	0	0	0	0	1	0	1	0	1	0	1	0	1	1	0	0	0	0	0	0	1	0	7	8
University of West London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
University of Westminster	1	0	1	0	0	0	1	0	1	0	0	0	1	1	1	1	0	0	0	0	0	0	1	0	7	9
University of Winchester	1	0	1	0	1	0	1	0	1	0	0	0	1	0	1	1	0	0	1	0	0	0	0	0	8	9
University of Wolverhampton	1	0	1	0	0	0	1	1	1	1	1	1	1	0	1	1	0	0	0	0	0	0	1	0	8	12
University of Worcester	1	0	1	0	0	0	1	0	1	0	0	0	1	0	1	1	0	0	1	0	0	0	1	0	8	9
University of York	1	1	1	1	0	0	1	1	1	1	1	0	1	1	1	1	1	0	0	0	0	0	1	0	9	15
York St John University	1	0	0	0	0	0	1	0	1	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	5	7

University - Due diligence Narrative (N), Quantitative (Q), Qualitative (QI)	Cont provi		Suppassocia		First supp case	olier	Supp monit		Stakel moni	holder toring	Worke supp engage	lier	Griev mecha		Griev mecha in sup	anism	Upco actio		Corre acti pla	ion	To	
, ,	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	Ν	Q	N	QI
Abertay University	1	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	4	4
Aberystwyth University	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	4	4
Anglia Ruskin University	1	0	1	0	0	0	1	1	1	0	1	0	0	0	0	0	1	1	1	1	7	10
Arden University	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	5	5
Aston University	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	1
Bangor University	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	3	3
Bath Spa University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
BIMM University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Birmingham City University	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	1
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	3
Brunel University London	1	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	4	4
Buckinghamshire New University	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	6	6
Canterbury Christ Church University	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	2
Cardiff Metropolitan University	1	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	6	6
Cardiff University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	7	7
Coventry University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	3	3
Cranfield University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	3	3
De Montfort University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Durham University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Edge Hill University	1	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	1	0	0	0	4	5
<b>Edinburgh Napier University</b>	1	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	5	5
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
Glasgow School of Art	1	0	1	0	0	0	1	1	0	0	0	0	1	0	1	0	0	0	1	0	6	7
Glyndŵr University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	4	4
Harper Adams University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0
Hartpury University Gloucester	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
Heriot-Watt University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	5	5
Imperial College London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	4	4
Kaplan International College London	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Keele University	1	0	1	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	4
King's College London	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
Kingston University	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	4	4

Lancaster University	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4
Leeds Beckett University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	3	3
Leeds Trinity University	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	4	4
Liverpool Hope University	0	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	1	0	1	0	6	6
Liverpool John Moores University	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	3	3
Liverpool School of Tropical Medicine	1	0	1	0	0	0	1	1	1	0	1	0	1	1	1	0	1	0	1	1	9	12
London Metropolitan University	1	1	1	0	1	0	1	0	1	0	1	0	1	1	1	0	1	0	1	0	10	12
London School of Economics and Political Science	1	0	0	0	1	1	1	0	1	0	1	0	1	1	1	1	0	0	1	0	8	11
London School of Hygiene and Tropical Medicine	0	0	0	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	7	7
London South Bank University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
Loughborough University	0	0	0	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	7	7
Manchester Metropolitan University	0	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	1	0	1	0	6	6
Middlesex University	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	3	3
Newcastle University	0	0	0	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	7	7
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	0	1	0	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	10	11
Nottingham Trent University	0	0	0	0	0	0	1	0	1	0	1	0	1	0	1	0	0	0	1	0	6	6
Oxford Brookes University	0	0	0	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	7	7
Plymouth Marjon University	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	3	3
Queen Margaret University	1	0	1	0	0	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	9	10
Queen Mary University	0	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	4	4
Queen's University Belfast	0	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	8	8
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2	2
Regents Theological College	1	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	1	0	1	0	7	7
Robert Gordon University	1	1	1	0	0	0	1	1	1	0	1	0	1	0	1	0	0	0	1	1	8	11
Roehampton University	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	0	0	1	0	6	6
Royal College of Art	0	0	1	0	0	0	1	1	0	0	0	0	1	0	0	0	1	0	1	0	5	6
Royal Holloway and Bedford New College	0	0	1	1	0	0	1	0	0	0	1	0	1	0	0	0	1	0	1	0	6	7
Sheffield Hallam University	1	1	1	0	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	9	10
Solent University	0	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	0	0	1	0	5	5
SRUC Aberdeen	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
St Mary's University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
Staffordshire University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
Swansea University	0	0	1	0	0	0	1	1	0	0	1	0	1	0	0	0	0	0	0	0	4	5
Teesside University	0	0	0	0	0	0	1	1	1	0	1	0	1	0	1	0	1	0	1	1	7	9
The Arts University Bournemouth	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	7	7
The Open University	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	5	5

The Royal Veterinary College	1	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	1	0	0	0	7	7
Ulster University	1	0	1	0	1	1	1	1	1	0	1	1	1	1	1	0	0	0	1	0	9	13
University College Birmingham	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University College London	1	1	1	1	1	0	1	0	1	1	1	0	1	1	1	0	1	1	1	1	10	16
University for the Creative Arts	1	0	1	0	1	0	1	1	1	0	1	0	0	0	0	0	1	1	0	0	7	9
University of Aberdeen	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	1	1	1	5	7
University of Bath	1	1	1	1	1	0	1	1	1	0	1	0	1	1	1	0	1	1	1	1	10	16
University of Bedfordshire	0	0	1	0	0	0	1	1	1	0	0	0	0	0	0	0	1	0	0	0	4	5
University of Birmingham	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Bolton	1	0	1	0	1	1	1	0	1	0	0	0	1	0	1	0	1	1	1	1	9	12
University of Bradford	1	1	1	0	1	0	1	1	1	1	1	0	1	1	1	1	1	1	1	1	10	17
University of Brighton	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Bristol	1	1	1	0	0	0	1	1	1	1	0	0	1	1	1	1	1	0	1	0	8	13
University of Cambridge	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	2	2
University of Central Lancashire	1	1	1	1	0	0	1	0	0	1	0	0	1	1	1	1	1	1	1	0	7	13
University of Chester	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	8	8
University of Chichester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Cumbria	1	1	1	0	1	0	1	1	1	0	1	1	1	0	0	0	1	1	1	0	9	13
University of Derby	1	1	1	0	1	0	1	1	1	0	0	0	1	1	1	1	1	1	1	1	9	15
University of Dundee	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of East Anglia	1	0	1	0	1	0	1	1	1	0	0	0	1	0	0	0	1	1	1	0	8	10
University of East London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	1	2
University of Edinburgh	1	1	1	0	1	1	1	1	1	0	1	0	1	1	0	0	1	1	1	1	9	15
University of Essex	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	2	3
University of Exeter	1	0	0	0	1	0	1	1	1	0	0	0	0	0	0	0	1	0	1	1	6	8
University of Glasgow	1	1	1	1	1	0	1	1	1	0	0	0	1	0	1	0	1	1	1	1	9	14
University of Gloucestershire	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	1	1	1	6	8
University of Greenwich	1	0	1	0	1	0	1	1	1	1	1	0	1	0	1	0	1	1	1	1	10	14
University of Hertfordshire	1	0	1	0	0	0	1	1	1	0	0	0	1	0	0	0	1	1	1	0	7	9
University of Huddersfield	1	1	0	0	1	0	1	0	1	0	0	0	1	0	0	0	1	0	0	0	6	7
University of Hull	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	2	2
University of Kent	1	1	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	1	0	0	5	7
University of Leeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Leicester	1	1	1	0	1	0	1	1	1	0	0	0	1	0	0	0	0	0	0	0	6	8
University of Lincoln	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Liverpool	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	5	5
University of London	1	1	1	0	1	0	1	1	1	0	0	0	1	0	0	0	1	1	1	0	8	11
University of Manchester	1	0	1	0	1	1	1	1	1	0	0	0	1	0	0	0	1	1	1	0	8	11
University of Northampton	1	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	1	1	1	0	6	7

University of Nottingham	1	1	1	0	1	0	1	1	1	0	1	0	1	0	1	1	1	1	1	1	10	15
University of Oxford	1	0	0	0	1	0	1	0	0	0	1	0	1	0	1	0	1	1	1	0	8	9
University of Plymouth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Portsmouth	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Reading	1	1	1	0	0	0	1	1	1	0	0	0	1	0	0	0	1	1	1	0	7	10
University of Salford	1	0	0	0	1	0	1	1	0	0	1	0	1	0	0	0	1	1	1	1	7	10
University of Sheffield	1	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	1	1	0	7	8
University of South Wales	1	1	1	0	1	0	1	1	1	0	0	0	1	0	1	0	1	1	1	1	9	13
University of Southampton	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	2	2
University of St Andrews	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	2	2
University of Stirling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Strathclyde	1	0	1	0	0	0	1	1	1	0	0	0	1	0	0	0	1	1	1	1	7	10
University of Suffolk	1	0	0	0	1	0	1	1	1	0	0	0	1	0	0	0	1	1	0	0	6	8
University of Sunderland	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1	1	1	0	5	6
University of Surrey	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Sussex	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	5	5
University of the Arts London	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	1	0	0	3	4
University of the Highlands & Islands	1	0	1	1	1	0	1	1	1	0	1	0	1	0	0	0	1	1	1	1	9	13
University of the West of England	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of the West of Scotland	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	1	1	1	1	6	8
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	1	1	1	0	9	10
University of Warwick	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of West London	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1	1	0	0	3	4
University of Westminster	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	1	0	0	3	4
University of Winchester	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
University of Wolverhampton	1	0	1	0	0	0	1	1	0	0	0	0	1	0	0	0	1	1	1	0	6	8
University of Worcester	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	1	0	1	0	5	5
University of York	1	0	1	0	1	0	1	0	0	0	0	0	1	0	0	0	1	1	1	0	7	8
York St John University	1	1	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	1	1	0	5	7

University - Risk assesment Narrative (N), Quantitative (Q), Qualitative (QI)	Ri assess state	ment		s of risk sment	Tracea	ability	ri	oliers sk sment	Detai supplie assess	er's risk	Stakel engag	nolder ement	Exp engage		Cou		Trans n ri			ness ership ks		ority eas	To <sup>s</sup>	
eddintative (ei)	N	Q	N	Q	N	Q	Ν	Q	N	Q	Ν	Q	N	Q	Ν	Q	Ν	Q	N	Q	N	Q	N	QI
Abertay University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Aberystwyth University	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	5	5
Anglia Ruskin University	0	0	1	0	1	0	1	1	1	1	1	1	0	0	0	0	0	0	1	1	1	1	7	12
Arden University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	3	3
Aston University	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Bangor University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bath Spa University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
BIMM University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Birmingham City University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Brunel University London	0	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	3	3
Buckinghamshire New University	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Canterbury Christ Church University	0	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3
Cardiff Metropolitan University	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	1	0	0	0	3	5
Cardiff University	0	0	0	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	5	5
Coventry University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Cranfield University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
De Montfort University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Durham University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Edge Hill University	0	0	0	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	5	5
<b>Edinburgh Napier University</b>	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	4	4
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	4	4
Glasgow School of Art	1	1	1	0	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	0	0	10	12
Glyndŵr University	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	5	5
Harper Adams University	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Hartpury University Gloucester	0	0	0	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	1	0	1	0	6	6
Heriot-Watt University	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	2
Imperial College London	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Kaplan International College London	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Keele University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
King's College London	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	4	4
Kingston University	0	0	0	0	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Lancaster University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2

Leeds Beckett University	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Leeds Trinity University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	5	5
Liverpool Hope University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	6	6
Liverpool John Moores University	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	6	6
Liverpool School of Tropical Medicine	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
London Metropolitan University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	8	8
London School of Economics and Political Science	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
London School of Hygiene and Tropical Medicine	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	1	0	1	0	9	9
London South Bank University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	0	8	8
Loughborough University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
Manchester Metropolitan University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
Middlesex University	1	0	0	0	0	0	1	0	1	0	1	0	0	0	1	0	0	0	1	0	0	0	6	6
Newcastle University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	6	6
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	0	1	1	1	0	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	11	13
Nottingham Trent University	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	4	4
Oxford Brookes University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
Plymouth Marjon University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Queen Margaret University	1	0	1	0	0	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	10	10
Queen Mary University	0	0	0	0	0	0	1	1	1	0	1	0	0	0	0	0	1	1	0	0	0	0	4	6
Queen's University Belfast	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	7	7
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Regents Theological College	1	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	1	0	1	0	1	0	7	7
Robert Gordon University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
Roehampton University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	1	0	1	0	1	0	9	9
Royal College of Art	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
Royal Holloway and Bedford New College	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	3	3
Sheffield Hallam University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
Solent University	1	0	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	5	5
SRUC Aberdeen	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
St Mary's University	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	11	11
Staffordshire University	1	0	0	0	0	0	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	6	6
Swansea University	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	5	5
Teesside University	1	1	1	0	0	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	1	0	6	8
The Arts University Bournemouth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
The Open University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
The Royal Veterinary College	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	0	0	1	1	1	0	9	10

Ulster University	1	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	6	6
University College Birmingham	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
University College London	1	1	1	0	1	0	1	0	1	1	1	0	1	0	1	0	1	1	1	0	1	0	11	14
University for the Creative Arts	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	5	5
University of Aberdeen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bath	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bedfordshire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bolton	1	1	0	0	1	0	1	0	1	0	1	0	0	0	1	1	1	1	1	0	1	0	9	12
University of Bradford	1	1	1	1	1	1	1	0	1	0	1	1	1	0	0	0	0	0	1	0	1	1	9	14
University of Brighton	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3
University of Bristol	1	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
University of Cambridge	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	2	2
University of Central Lancashire	1	1	1	1	1	0	1	0	1	0	1	0	1	0	0	0	1	0	1	0	0	0	9	11
University of Chester	1	0	1	0	0	0	1	0	1	1	0	0	0	0	0	0	1	0	0	0	1	0	6	7
University of Chichester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Cumbria	1	1	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	1	0	1	0	7	8
University of Derby	1	0	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	1	0	0	1	0	6	7
University of Dundee	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of East Anglia	1	0	1	0	1	0	1	1	0	0	0	0	0	0	0	0	1	0	1	0	1	0	7	8
University of East London	1	1	0	0	1	0	1	0	0	0	1	1	0	0	0	0	1	1	1	1	1	0	7	11
University of Edinburgh	1	1	1	1	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	11	20
University of Essex	1	1	1	1	0	0	1	1	1	1	0	0	0	0	1	1	1	0	1	0	1	0	8	13
University of Exeter	1	1	1	1	1	0	1	1	1	1	1	0	1	0	1	1	0	0	1	0	1	0	10	15
University of Glasgow	1	1	1	1	1	0	1	0	1	0	1	1	1	0	1	1	1	0	1	0	1	1	11	16
University of Gloucestershire	1	1	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	1	0	6	7
University of Greenwich	1	0	0	0	1	0	1	0	0	0	1	0	1	0	0	0	1	0	1	0	1	1	8	9
University of Hertfordshire	1	1	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	5	6
University of Huddersfield	1	1	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	4	5
University of Hull	1	0	1	0	0	0	1	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	5	6
University of Kent	1	1	0	0	0	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	4	5
University of Leeds	1	1	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	5	6
University of Leicester	1	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	3	4
University of Lincoln	1	1	1	0	0	0	1	1	1	0	0	0	1	0	0	0	0	0	1	0	0	0	6	8
University of Liverpool	1	1	1	0	1	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	1	0	7	9
University of London	1	1	1	0	0	0	1	1	1	1	1	0	1	0	1	1	1	0	0	0	1	1	9	14
University of Manchester	1	1	1	0	1	0	0	0	0	0	1	0	1	0	1	1	0	0	0	0	1	0	7	9
University of Northampton	1	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	3	4
University of Nottingham	1	1	1	0	1	0	1	0	1	1	1	0	1	0	1	1	1	0	1	0	1	1	11	15

University of Oxford	1	1	1	1	1	0	1	0	0	0	1	0	0	0	1	0	1	0	1	0	1	1	9	12
University of Plymouth	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	4	4
University of Portsmouth	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	4	5
University of Reading	1	1	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	5	6
University of Salford	1	1	1	0	1	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	1	1	8	10
University of Sheffield	1	0	0	0	0	0	1	0	0	0	1	0	1	0	0	0	1	0	0	0	1	1	6	7
University of South Wales	1	1	1	0	1	0	1	1	1	0	0	0	1	0	1	0	1	0	1	0	1	1	10	13
University of Southampton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of St Andrews	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	4	5
University of Stirling	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Strathclyde	1	1	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	1	0	7	8
University of Suffolk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Sunderland	1	1	1	0	0	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	1	1	6	8
University of Surrey	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	1	1	0	0	0	0	4	5
University of Sussex	1	1	1	0	0	0	1	1	1	0	0	0	0	0	0	0	1	0	0	0	1	0	6	8
University of the Arts London	1	1	0	0	1	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	4	5
University of the Highlands & Islands	1	1	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	1	0	1	0	8	9
University of the West of England	1	0	0	0	1	0	1	1	0	0	0	0	1	0	1	0	1	0	0	0	1	1	7	9
University of the West of Scotland	1	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	4	5
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	4	4
University of Warwick	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	2
University of West London	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	3	3
University of Westminster	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	3	3
University of Winchester	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	2
University of Wolverhampton	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	4	4
University of Worcester	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	3	3
University of York	1	1	1	0	1	0	0	0	0	0	1	0	0	0	1	0	1	1	1	0	1	0	8	10
York St John University	1	1	0	0	1	0	1	0	0	0	0	0	1	0	0	0	1	1	0	0	1	0	6	8

University - Effectiveness Narrative (N), Quantitative (Q) Qualitative (QI)	Measur metl			ilts of rement	decisi	ness ons by esults	Revi progress KPIs &		Exp stakeh		Resu corre action	ective	Resu grieva		exis	ew of ting Pls		otal ore
edamativo (e.)	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	Q	N	QI
Abertay University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aberystwyth University	1	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	4	4
Anglia Ruskin University	1	1	1	1	1	0	0	0	0	0	1	1	0	0	0	0	4	7
Arden University	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
Aston University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Bangor University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bath Spa University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BIMM University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Birmingham City University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Brunel University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Buckinghamshire New University	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	1
Canterbury Christ Church University	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1
Cardiff Metropolitan University	1	1	1	1	0	0	1	0	0	0	1	1	0	0	0	0	4	7
Cardiff University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Coventry University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cranfield University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
De Montfort University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Durham University	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0
Edge Hill University	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	3	3
Edinburgh Napier University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	3	3
Glasgow School of Art	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glyndŵr University	1	0		0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Harper Adams University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hartpury University Gloucester	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
Heriot-Watt University	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Imperial College London	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	1
Kaplan International College London	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	2
Keele University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
King's College London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Kingston University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lancaster University	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2

Leeds Beckett University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Leeds Trinity University	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1
Liverpool Hope University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liverpool John Moores University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liverpool School of Tropical Medicine	1	1	1	1	1	0	1	1	1	0	1	1	1	0	1	0	8	12
London Metropolitan University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
London School of Economics and Political Science	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	8	8
London School of Hygiene and Tropical Medicine	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
London South Bank University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Loughborough University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Manchester Metropolitan University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Middlesex University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	3	3
Newcastle University	1	1	1	0	1	0	1	0	0	0	1	0	0	0	1	0	6	7
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	1	1	1	1	0	1	0	0	0	1	1	1	0	1	1	7	11
Nottingham Trent University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Oxford Brookes University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Plymouth Marjon University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Queen Margaret University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Queen Mary University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Queen's University Belfast	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regents Theological College	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robert Gordon University	1	1	1	1	1	0	1	0	1	0	1	0	1	0	1	0	8	10
Roehampton University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Royal College of Art	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Royal Holloway and Bedford New College	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sheffield Hallam University	0	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	2	4
Solent University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SRUC Aberdeen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St Mary's University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Staffordshire University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Swansea University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Teesside University	1	0	1	1	1	0	1	1	0	0	1	0	0	0	0	0	5	7
The Arts University Bournemouth	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	3	3
The Open University	1	0	0	0	1	0	1	0	0	0	0	0	1	0	1	0	5	5
The Royal Veterinary College	1	1	1	1	0	0	1	0	0	0	1	0	1	1	1	1	6	10
Ulster University	1	1	1	1	1	0	1	1	1	0	0	0	1	1	1	1	7	12
University College Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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University College London	1	1	1	0	1	0	1	1	1	0	1	1	1	1	1	1	8	13
University for the Creative Arts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Aberdeen	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	3	3
University of Bath	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bedfordshire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Birmingham	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bolton	1	0	1	0	0	0	0	0	0	0	1	0	1	1	1	0	5	6
University of Bradford	1	0	1	0	1	0	1	1	0	0	1	0	1	0	1	1	7	9
University of Brighton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bristol	1	0	1	1	1	0	1	0	1	0	0	0	1	0	0	0	6	7
University of Cambridge	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	2	2
University of Central Lancashire	1	0	0	0	1	0	1	1	1	0	1	0	1	0	1	1	7	9
University of Chester	1	0	1	0	0	0	1	1	0	0	1	1	1	0	1	1	6	9
University of Chichester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Cumbria	1	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	3	3
University of Derby	0	0	1	0	0	0	1	1	1	0	1	0	1	1	1	0	6	8
University of Dundee	1	0	1	0	1	0	0	0	1	0	1	1	0	0	0	0	5	6
University of East Anglia	1	0	0	0	1	0	1	1	1	0	0	0	0	0	1	0	5	6
University of East London	1	1	0	0	1	0	1	0	0	0	1	0	0	0	1	0	5	6
University of Edinburgh	1	1	1	0	1	1	1	0	1	0	1	1	1	0	1	1	8	12
University of Essex	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	4	4
University of Exeter	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Glasgow	1	1	1	0	1	0	1	1	1	0	1	1	1	0	1	1	8	12
University of Gloucestershire	1	0	0	0	0	0	1	1	0	0	1	1	1	0	1	1	5	8
University of Greenwich	1	0	1	0	0	0	1	1	1	0	1	0	1	0	1	1	7	9
University of Hertfordshire	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Huddersfield	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Hull	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Kent	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Leeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Leicester	1	1	1	0	1	0	0	0	0	0	1	0	0	0	1	0	5	6
University of Lincoln	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Liverpool	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of London	1	1	1	0	1	0	1	1	0	0	1	0	1	0	1	1	7	10
University of Manchester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Northampton	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Nottingham	1	1	1	0	1	1	1	1	1	0	1	0	1	0	1	1	8	12
University of Oxford	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	4	4
University of Plymouth	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
University of Portsmouth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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University of Reading	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Salford	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	3	3
University of Sheffield	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of South Wales	1	1	1	0	1	0	0	0	1	0	1	0	0	0	1	0	6	7
University of Southampton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of St Andrews	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Stirling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Strathclyde	1	1	1	1	1	1	1	1	0	0	1	0	0	0	1	1	6	11
University of Suffolk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Sunderland	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Surrey	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Sussex	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of the Arts London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of the Highlands & Islands	1	1	1	0	1	0	0	0	0	0	1	0	0	0	1	0	5	6
University of the West of England	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of the West of Scotland	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	1
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Warwick	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of West London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Westminster	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Winchester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wolverhampton	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
University of Worcester	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
University of York	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3
York St John University	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	3	3

University - Training Narrative (N), Quantitative (Q) Qualitative (QI)	Training compa policies standa	iny and	Besp trair		Suppl trainii		Encoura supplie		Trair pla		Trair forr		Exte exp		Frequ	iency	Perforr	mance		tal ore
Qualitative (QI)	N	Q	N	Q	N	Q	N	Q	N	Q	Ν	Q	N	Q	N	Q	Ν	Q	N	QI
Abertay University	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	2	2
Aberystwyth University	1	0	0	0	0	0	0	0	1	0	1	0	0	0	1	0	0	0	4	4
Anglia Ruskin University	1	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	1	0	6	6
Arden University	1	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	4	4
Aston University	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	4	4
Bangor University	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Bath Spa University	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
BIMM University	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Birmingham City University	0	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	3	3
Bishop Grosseteste University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bournemouth University	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Brunel University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Buckinghamshire New University	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	4	4
Canterbury Christ Church University	0	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	3	3
Cardiff Metropolitan University	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
Cardiff University	1	0	1	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	5	5
Coventry University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cranfield University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

De Montfort University	1	0	1	0	0	0	0	0	1	1	1	0	0	0	0	0	0	0	4	5
Durham University	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Edge Hill University	1	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	4	4
Edinburgh Napier University	1	0	1	0	0	0	0	0	1	0	1	0	1	0	1	0	0	0	6	6
Falmouth University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Glasgow Caledonian University	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Glasgow School of Art	1	0	0	0	1	1	1	0	0	0	0	0	0	0	0	0	0	0	3	4
Glyndŵr University	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	4	4
Harper Adams University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hartpury University Gloucester	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Heriot-Watt University	1	0	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	4	4
Imperial College London	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Kaplan International College London	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
Keele University	1	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
King's College London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Kingston University	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Lancaster University	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	4	4
Leeds Beckett University	1	0	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	4	4
Leeds Trinity University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Liverpool Hope University	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	4	4

Liverpool John Moores University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Liverpool School of Tropical Medicine	1	1	1	0	1	1	1	0	1	0	1	0	0	0	1	0	0	0	7	9
London Metropolitan University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
London School of Economics and Political Science	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	9	9
London School of Hygiene and Tropical Medicine	1	0	0	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	5	5
London South Bank University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Loughborough University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Manchester Metropolitan University	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Middlesex University	1	0	0	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	8	9
Newcastle University	1	0	0	0	0	0	1	1	1	0	0	0	0	0	0	0	0	0	3	4
Newman University	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumbria University	1	0	1	0	1	0	1	0	1	0	1	0	0	0	1	1	1	0	8	9
Nottingham Trent University	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Oxford Brookes University	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Plymouth Marjon University	1	1	0	0	1	1	1	0	1	0	1	0	1	1	1	1	0	0	7	11
Queen Margaret University	1	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0	0	0	3	3
Queen Mary University	1	0	0	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	4	5
Queen's University Belfast	1	1	0	0	1	1	0	1	0	0	0	0	0	0	0	0	0	0	2	5
Ravensbourne University London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Regent's University London	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2

Regents Theological College	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2	2
Robert Gordon University	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1	4	5
Roehampton University	1	1	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	3	4
Royal College of Art	1	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	3	4
Royal Holloway and Bedford New College	0	0	0	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	4	4
Sheffield Hallam University	1	1	0	0	0	0	0	0	0	0	1	0	1	0	0	0	1	1	4	6
Solent University	1	1	0	0	1	1	1	0	1	0	1	0	0	0	1	1	0	0	6	9
SRUC Aberdeen	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
St Mary's University	1	1	0	0	1	0	1	0	1	0	1	0	0	0	1	0	0	0	6	7
Staffordshire University	1	0	0	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	5	5
Swansea University	1	0	0	0	1	1	1	0	1	0	0	0	0	0	0	0	0	0	4	5
Teesside University	1	1	0	0	1	1	1	0	1	0	1	1	0	0	1	0	1	0	7	10
The Arts University Bournemouth	1	0	1	0	0	0	0	0	1	0	0	0	0	0	1	1	1	0	5	6
The Open University	1	0	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	5	5
The Royal Veterinary College	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
Ulster University	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
University College Birmingham	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
University College London	1	1	1	1	1	1	1	1	1	1	1	0	1	0	1	1	1	1	9	16
University for the Creative Arts	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	5	5
University of Aberdeen	1	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	1	0	5	5

University of Bath	1	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	3	3
University of Bedfordshire	1	0	0	0	0	0	0	0	1	0	1	0	1	0	0	0	0	0	4	4
University of Birmingham	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Bolton	1	0	0	0	1	0	1	0	1	1	1	0	0	0	0	0	1	0	6	7
University of Bradford	1	0	0	0	1	0	0	0	1	1	0	0	0	0	1	0	0	0	4	5
University of Brighton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Bristol	1	1	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	3	4
University of Cambridge	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	5	5
University of Central Lancashire	1	1	1	0	1	0	1	0	1	0	0	0	1	0	0	0	1	0	7	8
University of Chester	1	1	1	0	1	0	1	0	1	0	0	0	1	0	0	0	1	0	7	8
University of Chichester	1	1	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	4	5
University of Cumbria	1	1	0	0	1	0	1	1	1	0	1	1	1	0	0	0	1	0	7	10
University of Derby	1	1	1	0	1	0	0	0	1	0	1	0	1	0	0	0	1	0	7	8
University of Dundee	1	1	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	3	4
University of East Anglia	1	1	1	0	1	0	0	0	1	1	0	0	0	0	0	0	0	0	4	6
University of East London	1	0	0	0	1	1	0	0	1	0	1	0	0	0	0	0	0	0	4	5
University of Edinburgh	1	1	1	0	1	1	1	0	1	1	1	0	1	1	1	0	1	1	9	14
University of Essex	1	1	1	0	1	0	0	0	1	1	0	0	0	0	1	0	1	0	6	8
University of Exeter	1	0	1	0	1	0	1	0	1	0	0	0	1	0	0	0	0	0	6	6
University of Glasgow	1	1	1	0	1	1	1	0	1	0	1	0	1	0	1	0	1	0	9	11

University of Gloucestershire	1	1	1	0	1	0	1	1	1	0	1	0	0	0	0	0	0	0	6	8	
University of Greenwich	1	1	1	0	1	0	1	1	1	0	1	0	1	0	0	0	1	0	8	10	
University of Hertfordshire	1	1	1	0	1	1	0	0	1	0	0	0	1	0	0	0	1	0	6	8	
University of Huddersfield	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
University of Hull	1	0	1	0	0	0	1	0	0	0	1	0	0	1	0	0	0	0	4	5	
University of Kent	1	1	0	0	1	0	1	1	1	0	1	0	0	0	0	0	0	0	5	7	
University of Leeds	1	0	1	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	6	6	
University of Leicester	1	1	1	0	1	0	0	0	1	1	1	0	0	0	0	0	0	0	5	7	
University of Lincoln	1	1	1	0	0	0	1	0	1	0	0	0	0	0	0	0	1	0	5	6	
University of Liverpool	1	0	1	1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	6	7	
University of London	1	1	1	0	1	1	1	0	1	1	1	0	1	0	1	0	1	1	9	13	
University of Manchester	1	1	1	0	1	0	1	1	1	0	1	0	1	0	1	1	1	0	9	12	
University of Northampton	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
University of Nottingham	1	1	1	1	1	1	1	0	1	1	1	1	1	0	1	1	1	0	9	15	
University of Oxford	1	1	1	0	1	1	0	0	1	1	1	0	1	0	1	0	0	0	7	10	
University of Plymouth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
University of Portsmouth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
University of Reading	1	1	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	0	5	6	
University of Salford	1	0	0	0	1	0	0	0	1	0	0	0	0	0	1	1	0	0	4	5	
University of Sheffield	1	0	1	1	1	0	1	0	0	0	1	0	0	0	1	0	0	0	6	7	

University of South Wales	1	1	1	0	1	0	1	1	1	0	0	0	0	0	1	0	1	0	7	9
University of Southampton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of St Andrews	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Stirling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Strathclyde	1	1	1	0	1	1	1	0	1	0	1	1	1	0	0	0	1	0	8	11
University of Suffolk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Sunderland	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	3	3
University of Surrey	1	1	0	0	1	1	0	0	1	1	1	1	1	1	1	1	1	0	7	13
University of Sussex	1	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	3	3
University of the Arts London	1	0	1	0	1	0	0	0	1	0	0	0	1	0	1	0	0	0	6	6
University of the Highlands & Islands	1	1	1	0	1	1	1	0	1	0	1	0	1	0	1	0	0	0	8	10
University of the West of England	1	1	1	1	1	0	1	1	1	0	1	1	1	0	1	1	1	0	9	14
University of the West of Scotland	1	1	1	0	1	0	0	0	1	1	1	0	0	0	1	0	0	0	6	8
University of Wales	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wales Trinity Saint David	1	0	1	0	1	0	1	0	0	0	0	0	1	0	1	0	0	0	6	6
University of Warwick	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	2
University of West London	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
University of Westminster	1	0	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	3	3
University of Winchester	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
University of Wolverhampton	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0	0	0	4	4

University of Worcester	1	0	1	0	1	0	0	0	1	0	0	0	0	0	1	0	0	0	5	5
University of York	1	1	1	0	1	0	1	0	0	0	1	0	1	0	1	0	0	0	7	8
York St John University	1	1	1	0	1	0	1	0	0	0	1	0	0	0	1	0	1	0	7	8