

Modern Slavery Act: 2022/23 Slavery and Human Trafficking Statement

1. Background

- 1.1. Modern slavery (slavery, servitude, forced or compulsory labour and human trafficking) is a very serious crime in which people are exploited for criminal gain. It exists in 167 countries¹ and affects 40.3 million people.² All businesses have a responsibility to ensure that workers are not being exploited and that relevant employment, health and safety, human rights and international standards are adhered to.
- 1.2. The Modern Slavery Act 2015 aims to tackle such exploitation. It requires organisations with a minimum annual turnover of £36m to report on what they are doing to address modern slavery within its business and produce a “*slavery and human trafficking statement*”³ for each financial year. Organisations that pursue primarily charitable or educational aims (such as the University) are also required to comply.
- 1.3. Northumbria continues to utilise updated Home Office modern slavery guidance ‘Transparency in Supply Chains: A Practical Guide’, which describes a number of best practices and introduces new definitions and states that MSA statements ‘*will be assessed by the public, investors, the media and other external parties*’. The then Home Secretary, RT Hon Amber Rudd MP, stated in her foreword to the guidance that tackling modern slavery is a top priority for the government but that the main driver for improvement is left largely to the ‘*court of public opinion*’ i.e. change should result from the scrutiny of the public, investors and stakeholders, and pressure from human rights organisations.

2. The Slavery and Human Trafficking Statement

- 2.1. This is a required statement of the steps that Northumbria has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its business. We do not have to guarantee that the entire supply chain is slavery free but we must set out the steps we have taken. The legislation sets out six areas of information that a slavery and human trafficking statement *may* include such as information on:
 - Organisational structure, business and supply chains
 - Modern slavery and human trafficking policies
 - Business and supply chains which present a risk of slavery and human trafficking, and steps taken to assess and manage that risk
 - Supply chain due diligence processes in relation to slavery and human trafficking
 - Effectiveness of steps taken with reference to appropriate performance indicators
 - The training about slavery and human trafficking available to its staff.
- 2.2. The law does not require a business to take any steps in these areas. If it wants to, a business can do nothing to reduce the risk of slavery in its supply chains and disclose this in its statement.⁴ However, this course of action may leave it susceptible to criticism and reputational damage.
- 2.3. The University is required to publish its updated MSA statement, which must be approved by the Board of Governors, within six months after the end of each financial year. Therefore, the updated statement should be published by 31 January 2024 (for the financial year 1 August 2022 – 31 July 2023). If the University failed to publish a statement, the Secretary of State could bring civil proceedings in the High Court for an injunction requiring compliance. The updated Home Office guidance indicates that the public and others will ‘*expect to see year-on-year improvements outlining progress on how they are tackling risks and incidence of modern slavery in their operations and supply chains*’.

¹ CIA World Factbook

² The Global Slavery Index 2018

³ Section 54, Modern Slavery Act 2015

⁴ Home Office Impact assessment on the Modern Slavery Bill 30 October 2014

3. Preparation of the University's MSA Statement

3.1. Modern Slavery is a potential risk in many of the University's supply chains: facilities management, professional services and technology, collaborative partners and students. Key elements of the 2022/23 Statement, which enhance our action to eliminate modern slavery and to ensure as far as possible slavery-free supplies to the University, include:

- We are in the process of working with colleagues to define what our goals and ambitions are in the area of Responsible Procurement which includes ethical supply chains and Modern Slavery. This is done in conjunction with a review of the University Financial Regulations and the development of an underlying expenditure policy.
- We will continue to enhance our working relationship with NEUPC and their recently updated Responsible Procurement Group.
- In October 2022 (via NEUPC) we joined Electronics Watch whose mission it is "to help public sector organisations work together, and collaborate with civil society monitors in production regions, to protect the rights of workers in their electronics supply chains".
- We updated our Ethical Investment Declaration in June 2023 outlining the commitments made within our Treasury Management and Ethical Investment Policy, which itself was updated in June 2023. This states that we hold no direct investments in arms companies, tobacco companies and companies complicit in the violation of international law (as well as fossil fuel and alcohol companies). Developments to our Treasury Management practice implemented early in 2021/22 reflect these commitments.
- We introduced a new Anti-Slavery and Human Trafficking Policy in addition to the MSA statement in June 2023. This states that we will continue to utilise the update Home Office modern slavery 'Transparency in Supply Chains: A Practical Guide.
- We included a modern slavery section in our online safeguarding training, which is available to all staff and mandatory for those in roles where safeguarding concerns could arise.

3.2. The updated 2022/23 Statement is attached at Appendix 1. This was prepared following consultation with relevant University staff. Many of the other commitments from previous statements are still applicable and have been repeated.

3.3. Governance Services leads on Modern Slavery and works closely with colleagues and, in particular, the University's Sustainability Management Group, chaired by the Pro Vice-Chancellor (Strategic Projects), to determine the University's risk appetite and subsequent Modern Slavery 'standards', identify roles and responsibilities in relation to new tenders, and assess the impact of the above in terms of resource requirements (people and/ or budgets). These standards inform a risk-based approach to procurement in the key categories above, which in turn inform contract owner decision making in reference to supplier responses to the University's Modern Slavery standard.

Appendix 1

Anti-slavery and human trafficking statement (2022/23)¹

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Northumbria University is a Higher Education Corporation and Exempt Charity. We are a research-intensive modern university that drives social mobility, is attractive to high-achieving students, has a global footprint, meets the skills needs of the economy and upskills the North East of England. Our work to address the UN's Sustainable Development Goals is supported by our commitment to improving our practices to identify and mitigate modern slavery or human trafficking in any of our supply chains which include: goods and services (facilities management, professional services and technology), international recruitment, collaborative partners and students.

As part of our initiative to identify and mitigate risk:

- We are an active member of the NEUPC, one of six UK Higher Education purchasing consortia who deliver and manage a range of collaborative framework agreements utilised by the University. The NEUPC has considered how to address the risk of slavery and human trafficking in its supply chain. A copy of NEUPC's Modern Slavery Statement can be found on their [website](#). We use the NEUPC public sector frameworks (where the responsible procurement agenda is well embedded) for the procurement of some of our goods and services. We are also an active member of NE5 which is a consortium of five North East Universities who work together on purchasing opportunities in the Facility Management area. NE5 agreements cover sustainability and modern slavery requirements;
- We have, via NEUPC, joined Electronics Watch whose mission is "to help public sector organisations work together, and collaborate with civil society monitors in production regions, to protect the rights of workers in their electronics supply chains".
- Our tender processes require potential suppliers to confirm their adherence to anti-slavery and human trafficking principles, and where the type of goods or services is classed as a higher risk category, additional questions specific to these goods or services are asked. Our contracts contain appropriate clauses placing obligations on suppliers in relation to the prevention of modern slavery and human trafficking;
- Consideration is given to suppliers' environmental and social credentials and we review these factors within the tender process (applying specific weighting to sustainability criteria in the selection process, where relevant) and through contract management, where appropriate.
- We use and promote a range of Fairtrade products across our campus, including coffee, tea and snacks. Their Fairtrade certifications indicates that they are known to have been produced under conditions which ensure decent working conditions for farmers and producers;
- We continue to work with our end user device provider Hewlett Packard, which is widely recognised as an industry leader in efforts to reduce modern slavery. We are currently undertaking a review of the reclamation and recycling companies used for IT equipment to maintain and improve the responsible disposal and recycling of the majority of the University's surplus end user IT equipment.
- Our [Treasury Management and Ethical Investment Policy](#), was updated in June 2023. This states that we hold no direct investments in arms companies, tobacco companies and companies complicit in the violation of international law (as well as fossil fuel and alcohol companies).

¹ This Statement covers not only Northumbria University but also the following wholly owned subsidiary companies: the University of Northumbria at Newcastle Developments Limited, Northumbria International Limited, Northumbria University Nursery Limited, Northumbria University Services Limited, and Northumbria University Amsterdam BV. In addition to the subsidiary companies, the University has a majority stake in a joint venture company, Northumbria London Campus Limited.

- We introduced a new Anti-Slavery and Human Trafficking Policy and Procedure enhancing the links to the existing Safeguarding policy including embedding Modern Slavery content in to the online Safeguarding training for all staff. Our students at all Northumbria campuses (including London and Amsterdam) have access to a range of specialist welfare services (available 24/7) if they wish to report a concern or request support in relation to suspected instances of modern slavery or human trafficking;
- Our [Human Resources Policies \(staff login required\)](#) set out our workers' rights at the University, and;
- We seek to protect staff through our [Public Interest Disclosure \("whistleblowing"\) Policy](#) should they wish to raise a concern, and through the [Code of Conduct: Working Together at Northumbria University](#).

Our plans for the future

We will continue to develop and enhance systems, processes and controls in an effort to further mitigate the risk of the existence of modern slavery in our supply chain, which may include appropriate training for relevant staff as well as focusing on high-risk categories to reduce risk. This will support our activity towards achieving Level 2 of the Flexible Framework. We will further develop a risk-based approach to the management of our supply chain in order to cover a larger supplier base, and to work with suppliers in high risk categories to ask that they demonstrate, rather than just confirm, compliance.

Northumbria will continue to enhance its due diligence framework for the consideration of potential partnering arrangements, including research partners. It is intended that potential partners will be required to confirm and demonstrate the steps which they are taking in relation to safeguarding and related modern slavery issues.

This statement has been approved by the University's Board of Governors and University Executive and will be reviewed on an annual basis.

Signed:.....

Professor Andy Long, Vice-Chancellor and Chief Executive