

Modern Slavery Act Statement 2019/20

Introduction

The University of Sussex is an independent corporate body established by Royal Charter in 1961. It is an exempt Charity under the meaning of the Charities Act 2011. The University is a leading teaching and research institution with annual income of around £300 million.

The University generates tuition fee income from its students, many of whom are in receipt of government funding, along with income from associated services such as student housing and catering. It attracts significant levels of research funding from industry, research councils Government and Charities.

The University offers more than 17,000 students over 200 undergraduate degrees and around 140 taught postgraduate programmes across 12 schools of study, including the Brighton and Sussex Medical School. The University also engages in activity overseas, delivering teaching and research in foreign institutions and conducting recruitment and marketing activity abroad.

The University employs over 2,350 staff, of which over half are support staff.

The Statement

This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our suppliers, students, staff, and the public about the University and its approach to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains.

The statement sets out the steps taken by the University to prevent forced labour and slavery in our supply chain, our own operations and through involvement with our business partners and specifically highlights those taken in the financial year 2018/19. In line with Home Office guidance we aim to make progress over a period of time across a broad range of potential exposures and this year of reporting sets out the steps taken to address key risk areas. These are primarily focussed around our conventional procurement activity and the active role that our staff play in procurement and our supply chain management; however there has been some progress in widening the scope of our efforts to include the University's approach to its fixed asset investment management activity. This is consistent with a broader and longer term intention to focus our actions in other areas of our business including contractual relationships and partnerships with other organisations that fall outside of the conventional procurement and supply chain activity.

Specific steps taken during the year include:

1. Updating of the University standard Terms and Conditions for the Supply of Goods and Services including a specific section detailing our requirements under the Act.
2. Putting into place improved processes for procuring and contracting within the university, ensuring that high-risk categories are carefully monitored through set procedures and reviewed to ensure best practice is applied.
3. Continued prominence and promotion of Modern Slavery e-learning for the University. The training equips those involved in relevant activity to understand the concept of modern slavery, identify associated risks and work effectively with procurement professionals, University leadership and suppliers to mitigate them.
4. The implementation and ongoing enhancement of a Supplier Relationship Management (SRM) tool. This tool enables Suppliers to self-register their details and requires that they confirm their understanding of, and commitment to the Act before being able to do so. The tool also enables far greater levels of supply chain analysis, making it easier to identify existing suppliers or contracts that may contain risk and address them effectively.

5. Membership of a Sussex wide network of procurement professionals, in collaboration with Sussex Police and expressly designed to focus on sharing best practice, learning and understanding of Modern Slavery and the supply chain.
6. Publication of a new Purchasing Policy and associated e-learning and guidance that makes our processes and requirements clear to those involved in purchasing on behalf of the University. This addresses the Act explicitly and ensures that our processes mitigate against associated risks.
7. Increasing the prominence of the statement on our website to enable access to it in under 3 clicks.

The University's supply chains mainly fall under four categories, which are:

- Science, Technical, Engineering and Medical Goods and Services
- Professional Services
- ICT Equipment and Services
- Estates Goods, Services and Works

The principal areas which carry material risks are office supplies, laboratory consumables, ICT and AV equipment and some estates services, such as cleaning and security services. The majority of these items are purchased under the Southern Universities Procurement Consortium (SUPC) who fully support the Act. Their statement and further information on how they ensure compliance with the Act can be found via the link below:

<http://www.supc.ac.uk/images/documents/SUPCStatementonModernSlavery.pdf>

Many of the SUPC suppliers in these higher-risk areas will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) and SUPC work to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

These principles are underpinned by the University's contractual terms. Our terms and conditions are designed to be used for all companies with whom we contract and stipulate that the same terms apply to all parts of their associated supply chains. Wherever possible the University ensures that our terms and conditions are used but in instances where a supplier's terms are used, the University will conduct a full review to ensure that these principles are adhered to in full. For instances where terms are agreed with any foreign government or institution with whom the University contracts abroad, it will be ensured that equivalent terms exist within the contract. This process is defined in the University's Purchasing Policy which can be found on the University's Procurement web pages via the link below:

<http://www.sussex.ac.uk/procurement>

Other framework agreements are used to procure goods and services, including Crown Commercial Services, JISC, Crescent Purchasing Consortium and others. The University places reliance on these frameworks only to the extent that they explicitly state an approach to Modern Slavery and forced labour that is assessed by the University to be adequate and otherwise procurement projects and suppliers are assessed on a case by case basis through planning processes and ongoing contract management.

<https://www.jisc.ac.uk/about/corporate/slavery-and-human-trafficking-statement>
<https://www.thecpc.ac.uk/aboutus/sustainability.php>

<https://www.gov.uk/government/organisations/crown-commercial-service/about>

Compliance with the Act is incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of the University's terms and conditions which are explicit on our requirements under the Act. In instances or markets where a higher risk is identified, additional qualifying criteria will be included in any evaluation process.

Suppliers must proactively declare that they conform with the Act when they register with us and this is recorded within our supplier network database.

The University commits to developing a better understanding of its supply chains and working towards greater transparency and responsibility towards people working within them.

For contracts already awarded prior to 2015 we continually review those which represent a medium-to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, and partnering organisations, we will monitor those supply chains that have been identified as a potential risk and take appropriate action where necessary.

This statement has been approved and published by the Council of the University of Sussex and will be reviewed at least once annually.