

## 2020/21 Modern Slavery 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 countries<sup>1</sup> and affects

40.3 million people.<sup>2</sup> 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*”<sup>3</sup> 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.<sup>4</sup> However, this course of action may leave it susceptible to criticism and reputational implications.

2.3. The University is required to publish its updated MSA statement within six months after the end of each financial year, which must be approved by the Board of Governors. Therefore, the updated statement should be published by 31 January 2022 (for the financial year 01 August 2020 – 31 July 2021). 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*’.

<sup>1</sup> CIA World Factbook

<sup>2</sup> The Global Slavery Index 2018

### **3. Preparation of the University's MSA Statement**

3.1. Modern Slavery is a risk in many of the University's supply chains: facilities management, professional services and technology, collaborative partners and students. Northumbria's working group on modern slavery, which has included a cross section of University staff since its creation in April 2016, continues to meet to gather views on relevant risks and actions undertaken, which are then captured in the annual Statement.

3.2. Key elements of this 2020/21 Statement, which enhance our action to eliminate modern slavery and to ensure as far as possible slavery-free supplies to the University, include:

➤ We have used the recognised Prioritisation Tool to identify social and environmental risks, including modern slavery, against all of our spend categories. This assessment tool considers spend in each category, as well as the scope and influence we have to address risks and opportunities. The result of the assessment is that the following categories are recommended as the most important ones to review:

- Hard Facilities Management
- Soft Facilities (including waste management, clothing and catering)
- Marketing (including merchandise)
- Travel (including taxis)
- ICT (in particular hardware and network)
- Sustainable Food

➤ We updated our Ethical Investment Declaration in August 2020 outlining the commitments made within our Treasury Management and Ethical Invest Policy. 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 planned during 2020/21 and implemented early in 2021/22 reflect these commitments.

3.3. The updated 2020/21 Statement is attached at Appendix 1. This was prepared following consultation with a cross-section of University staff. The vast majority of input and advice to inform the update of and new content for the statement was supplied by the University's Sustainability Adviser and the Procurement team in Finance. Many of the other commitments from previous statements are still applicable and have been repeated.

3.4. During 2019/20, the Vice-Chancellor allocated formal responsibility for the co-ordination of work in this area to Governance Services to reflect the links between modern slavery and safeguarding as well as general compliance activities.

3.5. Governance Services now 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.

#### **Anti-slavery and human trafficking statement (2020/21)<sup>1</sup>**

<sup>1</sup> 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.

*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-rich, business focused professional university with a global reputation for academic excellence. 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 working towards achieving Level 2 of the Flexible Framework. As part of this effort, we have used the recognised Prioritisation Tool to identify social and environmental risks, including modern slavery, against all of our spend categories. This assessment tool considers spend in each category, as well as the scope and influence we have to address risks and opportunities. The result of the assessment is that the highest priority categories for continued focus are:

- Hard Facilities Management
- Soft Facilities (including waste management, clothing and catering)
- Marketing (including merchandise)
- Travel (including taxis)
- ICT (in particular hardware and network)
- Sustainable Food

The next step is to review the risk and opportunity management initiatives already in place for each of these categories, as well as identifying further measures we can implement. These will then form part of the category plans to ensure actions are completed.

➤ 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 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 sustainability agenda is well embedded) for the procurement of some of our goods and services, including in 2020/21, laboratory and IT accessory equipment. 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;

➤ 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;

➤ 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, who are widely recognised as industry leaders in efforts to reduce modern slavery. We also use an accredited IT reclamation and recycling company to ensure the responsible disposal and recycling of the majority of the University's surplus end user IT equipment.
- We updated our Ethical Investment Declaration in August 2020 outlining the commitments made within our Treasury Management and Ethical Investment Policy. 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).
- 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 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 our new "Speaking Up" Code of Conduct.

**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 Tom Lawson, Interim Vice-Chancellor and Chief Executive