

# Modern Slavery Act 2015

## Introduction

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This modern slavery statement outlines our commitment to being an ethically and socially responsible organisation.

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 have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Birmingham City University has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will also implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, and where possible in our supply chain, pursuant to Section 54 part 6 of the Modern Slavery Act 2015.

Management at all levels are responsible for ensuring those reporting to them are aware of and comply with this statement. All University employees will have responsibility for upholding the statement principles.

## Current Structure

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The University has an enviable reputation for providing quality, student focused education in a professional and friendly environment and is split into four faculties:

Arts, Design and Media  
Business, Law and Social Sciences  
Computing, Engineering and the Built Environment  
Health, Education and Life Sciences

These are supported by Professional Services functions including Information Technology, Human Resources, Finance, and Estates and Facilities.

We currently have 29,000 students and an annual turnover of £275 million.

## Our Policies

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We are committed to making sure that all employees, are treated with respect and dignity and in accordance with our values. This includes, ensuring that working conditions and arrangements are safe, working hours are not excessive, and that individuals are properly compensated for their effort. We will also seek to encourage compliance with such matters, amongst external partners and those organisations that the University engages with.

The University operates policies that seek to mitigate the risks of modern slavery and human trafficking within its own employee community by using only specified, reputable employment agencies to source labour and verifying the practices of any new agency it proposes to use before accepting workers from that agency.

The University also has a Whistleblowing (Disclosure in the Public Interest) Policy (<https://www.bcu.ac.uk/about-us/corporate-information/policies-and-procedures>) which encourages all workers, customers and other business partners to report any concerns relating to the direct activities or the supply chains of the University including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Where University employees have such concerns, these should as soon as possible, be raised in the first instance with their line manager.

Our Sustainable and Ethical Procurement Process encourages our suppliers to adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

The University works with suppliers to ensure that they meet the standards of the University's supplier code of conduct and improve working conditions for their workers. Serious violations of the code may lead to the termination of the business relationship.

## Birmingham City University's Supply Chain

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We are committed to ensuring there is no modern slavery or human trafficking in any of our supply chains or in any part of the University's business.

Fundamental to our ethical conduct is assisting with the eradication of unethical business practices, including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour. Procurement processes must seek to protect the interests of the University by ensuring that all conflicts of interest are identified and acted upon. To this end, at the start of a procurement activity, all stakeholders involved in the process are requested to complete a Declaration of Interest form in relation to potential tenderers. The stakeholder must also advise if a conflict arises following the notification of final respondents. In addition, tenderers are requested to declare any conflict of interest with the University as part of their tender submission.

Birmingham City University is committed to ethical procurement and therefore requires contractors to demonstrate, support and abide by our efforts in achieving the organisation's environmental and ethical objectives as laid out in our Sustainable Procurement Policy.

<https://www.bcu.ac.uk/about-us/corporate-information/environment-sustainability/sustainable-procurement>

The University's supply chains are managed under four 'Super-categories':

- Travel and Utilities
- ICT equipment and services
- Estates goods, services and works
- Professional Services

Our assessment at this time is that the principal areas which carry material risks are office supplies, laboratory consumables, uniforms, ICT and AV equipment and some estates services such as cleaning, catering and security services.

The Procurement team is responsible for ensuring that the Modern Slavery Act and its requirements are incorporated in procurement projects where appropriate, and that the University's supply chain is managed holistically as part of the category management process, and also on a contract-by-contract basis.

In support of this, our Procurement team has introduced a Contract Management Toolkit which also addresses Modern Slavery as part of the management of contracts and has provided training to relevant employees across the University.

The University is of course aware that in some situations students can have agreements that they have freely entered into which mean they are required to work for a period following completion of their studies. The University will therefore continue in its efforts to raise awareness of the risk of modern slavery amongst its student as well as its employee populations.

## **Effectiveness and Further steps**

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We will continue to develop and enhance our systems, processes and controls to mitigate the risks of modern slavery and human trafficking within our supply chains. This will be achieved through:

- The further review of our HR policies to ensure these assist in minimizing the risk of modern slavery and human trafficking
- Continued awareness raising amongst employees of modern slavery and human trafficking including at induction.
- The consistent and effective use of our recruitment and selection policy and procedures
- Providing staff with access to on-line training on Modern Slavery and human trafficking.

The University will also periodically review the effectiveness of the policies, training and other measures taken to combat modern slavery and human trafficking.

## **Statement**

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This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement for the financial year ending 2023.

This statement will be reviewed and updated on an annual basis.

**Mark O'Dwyer, Director of Human Resources**

**Birmingham City University November 2022**