

Modern Slavery Act Statement

1. Introduction

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2019. This is our second statement under the Act and provides an overview of our continuing progress in this area.

2. Organisation

The University is a public research university located principally in Uxbridge, West London. It was founded in 1966 and named after the Victorian engineer Isambard Kingdom Brunel. The University exists by virtue of a Royal Charter first granted in 1966. Its governing body is called the Council and comprises a mix of independent members, staff and students of the University. The University is an exempt charity as defined by the Charities Act 2011.

The Council appoints the Vice-Chancellor and other senior officers. Its powers, duties and functions are set out in full in the Charter. Council has established a range of Committees to carry out its work.

The academic governing body of the University is the Senate, which is chaired by the Vice-Chancellor. Senate's powers, duties and functions are set out in the Ordinances, and it has established a number of Committees to assist it in its work. The University's core business is teaching and research. This is conducted primarily through three Colleges and three research institutes, which are supported by professional services divisions. The University has over 13,500 students and 2,500 staff. The University is supported by a centralised procurement and contracting function with transactional purchasing devolved to individual departments.

3. Supply Chains

The annual third-party expenditure for the University is circa £100M which can be supplemented by significant capital investment aligned with the University's Capital Programme. The University procures a wide range of goods, works and services and treats all suppliers equally, and without discrimination and in a transparent and proportionate manner.

The University procures a significant range of goods, works and services across key categories of spend including but not limited to Soft Facilities Management, Construction & Hard Facilities Management, Information, Communications & Technology, Business & Administration Services and Medical, Veterinary, Agricultural & Laboratory activities.

The University expects its suppliers and other business partners to have the same high ethical standards in promoting safe and fair working conditions and promoting ethical sourcing within their supply chains.

Whilst the University believes the risk of modern slavery in our supply chains is low, our policies and practices are designed to identify and mitigate any risk.

4. Policies and Practices

In April 2019 the University approved its new procurement strategy - a two year plan for transforming procurement and creating a centre of excellence. This procurement strategy underpins the University's commitment to acquiring goods, works and services for its use without causing harm to others. In doing so, the University is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.

The University is adopting a "Responsible Procurement" Policy that will ensure that decisions taken by the University on the procurement of goods, works or services are undertaken in line with our commitments under the following themes:

- Delivering social value
- Improving environmental sustainability
- Promoting ethical sourcing practices
- Encouraging equality, diversity and inclusion

Our Human Resource policies ensure that workers are appointed legally and rigorous checks are carried out on all new appointments both permanent and fixed term including student workers and international researchers. These policies are fully supported by guidance for Managers. The appointment of temporary or interim resources are through a preferred supplier list reviewed and monitored by both Human Resources and Procurement Services.

Staff equality and diversity sits within the University's Human Resources Department (HR). HR is responsible for supporting equality and diversity policy development and implementation, and seeks to engage all University staff in promoting a positive and fully inclusive work environment. The Equality Impact Assessment Review Group ensures that the University engages with the Equality Impact Assessment process and give legal consideration to the requirements of the Equality Act 2010 by reviewing all the equality impact assessment carried out on the University policies, functions and practices.

The University launched its equality and diversity policy for employment in June 2014. The University is committed in its pursuit of academic excellence to equality of opportunity and to a pro-active and inclusive approach to equality, which supports and encourages all under-represented groups, promotes an inclusive culture, and values diversity.

5. Responsible Procurement

The University spends circa £100 million on goods, services and works per annum and therefore has a significant opportunity to leverage its supply chain to deliver additional benefits to the University, students, local residents, businesses and communities.

By paying careful attention to how goods, services or works will be delivered, who may be delivering them and what else the supplier can do to deliver added value the University aims to deliver social value, improve environmental sustainability, promote ethical sourcing practices and encourage equality, diversity and inclusion.

All procurements conducted by the University and by those contracted by the University to act on their behalf will do so following the Government Buying Standards 'Mandatory' criteria.

6. Support for the Ethical Trading Initiative

The University is committed to acquiring goods, services or works without causing harm to others. The University supports the Base Code of the Ethical Trading Initiative. The Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. The standards are:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

The above constitute the minimum and not maximum standards, and should not be used to prevent suppliers from exceeding these standards.

7. Ethical sourcing practices

The University promotes ethical sourcing by adopting a risk and opportunity-based approach to identify contracts and areas of spend where there may be a high risk of poor working conditions, human rights abuses or negative impacts on security and crime. The University will seek to improve transparency within the supply chain, and work with suppliers to improve any poor performance identified as part of a process of continuous improvement, reflecting existing and emerging legislation and guidance.

8. Next Steps

At the University, we are committed to protecting and respecting human rights and to ensuring that no slavery and human trafficking are in our supply chains or part of our business. To deliver on this, going forward the University will be doing the following:

- Launching its eSourcing Platform which will provide a simple, secure and efficient means for managing, tendering, evaluation and contract management and for analysing spend. This improved business intelligence will help the Procurement Services organisation to identify risks in the supply chain.
- New suppliers will be required to complete a self-declaration to confirm they meet the requirements of the Modern Slavery Act.
- The University's new terms and conditions for the supply of goods, works and services will require suppliers to comply with the UK Modern Slavery Act 2015 and all other applicable laws regarding anti-slavery and human trafficking.
- For all procurements of significant value or where the University identifies an increased risk to its supply chain, the University will require suppliers to:
 - maintain policies to ensure compliance;
 - perform due diligence on their supply chains and include anti-slavery and human trafficking provisions in such supply contracts;
 - notify the University of any breaches and provide the University with annual compliance reports.
- All Procurement Services personnel to undertake Modern Slavery training.
- Procurement Services will continue to review key supply chains to identify risks and prioritise actions.

Signed by:



Chair of Council

08 October 2019