



## Modern Slavery 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 31 July 2024 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, with an overseas presence in China and Bahrain. 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 President 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 and President. 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 four Colleges, which are supported by professional services divisions. The University has around 13,000 students and 2,000 staff. The University is supported by a centralised procurement function to oversee significant spend areas.

### 3. Supply Chains

The annual third-party expenditure for the University is circa £65m which can be supplemented by significant capital investment aligned with the University's Capital Programme. The University procures a broad range of goods, works and services, and conducts all procurement activities in a fair, transparent, and proportionate manner ensuring that all suppliers are treated equally and without discrimination. The University procures a wide range of goods, works, and services across key spend categories including - but not limited to - soft facilities management, construction and hard facilities management, information and communications technology, business and administrative services, and medical, veterinary, agricultural and laboratory activities.

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

Whilst the University considers the risk of modern slavery within its supply chains to be low, our policies and procedures are designed to identify, address, and mitigate any potential risk.

### 4. Policies and Procedures

The University's Procurement Policy underpins the University's commitment to acquiring goods, works, and services in a manner that does not cause harm to others. In doing so, the University supports the UK Government's implementation of the UN Guiding Principles on Business and Human Rights.

To uphold these values, the University has adopted a **Responsible Procurement Policy** that ensures all procurement decisions reflect 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, diversity and inclusion 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 University engages with the Equality Impact Assessment process and gives 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, Diversity and Inclusion Strategy in 2021, reaffirming its commitment to equality of opportunity and an inclusive culture that values diversity and supports under-represented groups as part of our pursuit of academic excellence. Any employee found to have been acting in breach of our stated policies may be subject to our disciplinary policy and procedures.

## **5. Responsible Procurement**

The University spends approximately £65m each year on goods, services and works giving it a substantial opportunity to leverage its supply chain to generate wider benefits for the University, its students, local residents, businesses and communities.

By carefully considering how goods, services or works are delivered, who is delivering them and what additional value suppliers can offer, the University aims to deliver social value, improve environmental sustainability, promote ethical sourcing practices and encourage equality, diversity and inclusion.

All procurement activities undertaken by the University – or by any must adhere to the 'mandatory' criteria set out in the Government Buying Standards.

## **6. Due Diligence and Risk Assessment**

The University conducts risk-based due diligence across all procurement categories. Suppliers for contracts above £50,000 must sign the University's Supply Chain Code of Conduct, confirming adherence to ethical standards including freedom of association, safe working conditions, and prohibition of forced or child labour. The University is an affiliate of Electronics Watch and procures through SUPC frameworks requiring compliance with the Sustain Supply Chain Code of Conduct.

## **7. Support for the Ethical Trading Initiative**

The University is committed to acquiring goods, services or works in a manner that doesn't cause harm to others. The University supports the Base Code of the Ethical Trading Initiative which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised benchmark for labour practice. Its key principles include:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour is prohibited
- Living wages are paid
- Working hours are not excessive

- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

These represent minimum standards, not maximum expectations and suppliers are encouraged to exceed these standards wherever possible.

### **8. Ethical Sourcing Practices**

The University promotes ethical sourcing by adopting a risk-and-opportunity-based approach to identify contracts and areas of spend that may present 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 its supply chains and will work collaboratively with suppliers to address any area of poor performance. This approach supports continuous improvement and reflects both current and emerging legislation and guidance.

### **9. Training**

All procurement staff completed mandatory modern slavery training, including HEPA's 'Guide to Modern Slavery', 'Supplier Due Diligence and Risk Management', and the LUPC 'Protecting Human Rights in the Supply Chain' module.

A handwritten signature in blue ink that reads "S. B. Palmer." The signature is written in a cursive style and is centered within a light blue rectangular box.

Signed:

Chair of Council

Date: 24 March 2026