

# 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 2022 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 three Colleges and five research institutes, which are supported by professional services divisions. The University has over 16,000 students and 2,500 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 £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 Procedures

The 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 has adopted a "Responsible Procurement" Policy that ensures 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, 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. 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.

Any employee found to have been acting in breach of our stated policies can be subject to our disciplinary policy and procedures.

## **5. Responsible Procurement**

The University spends circa £100m 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. Due Diligence and Risk Assessment**

Procurement work closely with other universities and Brunel is a member of the Southern Universities Purchasing Consortium (SUPC). SUPC publishes its own modern slavery statement and has registered with the Transparency in Supply Chains Platform (TISC) report website as a demonstration of its compliance and its commitment to eradicating modern slavery throughout the SUPC supply chains supporting higher education.

SUPC is also in turn a member of Procurement England Limited (PEL), the shared vehicle by which English higher education purchasing consortia manage joint developmental and improvement projects for collaborative procurement in our sector. Together, the purchasing consortia have published a shared sustainability policy to which all PEL member consortia are committed. This policy contains steps that form part of the supplier selection for the major contract procurement processes that are conducted for the consortium members.

In conjunction with the SUPC, The University's procurement function also work with and procures from other Government backed purchasing consortia such as the Crown Commercial Services (CCS) in cases where SUPC are unable to offer certain services and supplies the University needs. All the

consortia the University uses are broadly comparable with the SUPC when it comes to the rigor in their approach to eradicating modern slavery in their supply chains.

## **7. 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. 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 shall not be used
- 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 are the minimum and not maximum standards and should not be used to prevent suppliers from exceeding these standards.

## **8. 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.

Signed:

Chair of Council

Date: 1 May 2022