Modern Slavery Act 2015 Statement for financial year ending 31st July 2016

Introduction

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that the University of Salford (‘the University’) has taken during its financial year 2015/16, or will thereafter be taking, to ensure that no slavery or human trafficking is taking place within any part of its business or any of its supply chains.

This statement covers the University and its subsidiaries through which its activities are carried out and references to “we” and “us” are to be construed accordingly.

Organisation Structure

The University is incorporated by Royal Charter and is an exempt charity.

The University Council (our supreme governing body) is responsible for the management and administration of our revenue and property and for our business and strategic direction.

The University Senate (which reports to the University Council) is responsible for maintaining the academic quality and standards of our awards and the learning experience of our students.

The Vice-Chancellor is responsible for day-to-day leadership and management of our business and leads the development and delivery of our vision and strategy.

Our policy

We are committed to maintaining the highest ethical standards and to ensuring that no slavery or human trafficking is taking place in any part of our business or supply chains. Work is underway on a stand-alone University Policy to reflect our commitment and to embed appropriate processes and procedures into our operations.

We comply with all legislation and regulatory requirements in relation to slavery and human trafficking. Everyone in our business is required to uphold the highest standards of integrity in their business activities and to comply with all applicable laws of the United Kingdom and other countries in which they are working.

Our business and supply chains

We have approximately 20,000 students, 2,500 employees and operate from 3 campuses in Salford: Peel Park, Frederick Road and MediaCity.

We deliver higher education courses within the United Kingdom and overseas (this can be direct or through other educational establishments, such as universities and further education colleges, with whom we collaborate). We also undertake research and enterprise activities.

We are organised into 7 Schools (Built Environment; Nursing, Midwifery, Social Work and Social Sciences; Health Sciences; Computing, Science and Engineering; Environment and Life Sciences; Arts and Media and Business) with supporting professional directorates.
We procure a wide range of goods and services and maintain relationships with a network of representatives in the United Kingdom and overseas for the recruitment of students.

We aim to identify and only do business with suppliers and organisations whose values and standards match our own. We expect all suppliers and organisations we do business with to adopt and enforce equivalent policies in their own operations and to encourage their own suppliers to do the same.

Were we to identify any concerns or areas for improvement we would in the first instance work with relevant suppliers, representatives and educational establishments to ensure they were satisfactorily addressed and would then monitor them to ensure continued compliance. As a last resort, we would seek to terminate relationships with anyone who refused to take remedial action or who failed to share our policy of zero tolerance of slavery and human trafficking.

Assessment of areas of risk

We have assessed our business areas and supply chains and consider the following of them to be the most likely to give rise to a risk of slavery or human trafficking:

- Recruitment of staff (particularly those involved with cleaning/security/catering/hospitality)
- Supplies of office furniture/equipment/stationery
- Supplies of workwear
- Supplies of foodstuffs/beverages
- Supplies of information and communications technology/audio visual equipment

Key responsibilities

Our centralised Procurement Team is responsible for approving all new suppliers and for issuing tenders for goods and services above a specified threshold. The majority of transactional purchasing is devolved to individual departments which are required to comply with our purchasing policies and procedures.

Our Academic Business Development Office, which works with colleagues in our Schools, is responsible for all academic collaborations.

Our Student Admissions Team is responsible for appointing and managing the representatives who recruit students for us.

Our Human Resources Team is responsible for recruiting all temporary and permanent staff.

What we have done and will be doing

Recruitment of staff

We have robust recruitment processes in place and were the first university in the North West of England to sign up to the Living Wage – an improved rate of pay scheme which exceeds the Minimum Wage.

We comply fully with all applicable legislation (this includes limits on working hours).

We have a Whistle Blowing Policy which enables employees to raise concerns about any criminal offences or breaches of any legal obligations.

Suppliers

We use existing framework agreements of regional higher education purchasing consortia (e.g. North Western Universities Purchasing Consortium (of which we are a member) and North Eastern Universities Purchasing
Consortium) for the purchase of certain types of goods and services. We will be checking the steps taken or being taken by those consortia with their panels of suppliers in respect of slavery and human trafficking.

New suppliers must be approved by our Procurement Team before purchases can be made from them and, as part of the approvals process, we will be introducing an additional check regarding the suppliers’ measures on slavery and human trafficking. We will also be adding evidence gathering questions to our in-house procedures for tenders and contracts.

We will be reviewing our existing suppliers in the areas we assess as being ‘at risk’ to check the steps they have taken and are taking to eliminate slavery and human trafficking from their business and supply chains. Appropriate action will be taken to address any concerns we identify.

We will be buying a subscription to the NETpositive Supplier Engagement Tool which was specially developed to support sustainable procurement by universities, but which has been adapted to enable universities to also meet their obligations on slavery and human trafficking. Having access to relevant information about our suppliers via this Tool will more fully inform our decisions about the suppliers we do business with.

We will be adding an express obligation on slavery and human trafficking to our standard terms and conditions of purchase and our consultancy agreements and, where applicable, will also require suppliers to take similar steps in respect of the sub-contractors they use.

**Representatives and educational establishments we do business with**

We undertake due diligence on representatives and educational establishments before we do business with them and this will be expanded so that we gather information about their approach to slavery and human trafficking.

As part of our ongoing review and monitoring activities, we will be checking the steps that the representatives and educational establishments we are already doing business with have taken and are taking to eliminate slavery and human trafficking from their businesses and supply chains. Appropriate action will be taken to address any concerns we identify.

We will be adding an express obligation on slavery and human trafficking to our agreements with representatives and educational establishments and, where applicable, will also require representatives and educational establishments to take similar steps in respect of the sub-contractors they use.

Further information on Modern Slavery can be found at [https://modernslavery.co.uk](https://modernslavery.co.uk)