

## **Modern Slavery Act 2015 Statement for financial year ending 31<sup>st</sup> July 2020**

### **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 2019/20, 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 UK.

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 4 Schools (Health and Society; Science, Engineering and Environment; 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 clothing and footwear (including 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. We have continued to raise the awareness of these individual departments of the risk of slavery or human trafficking in the above business areas.

Our Academic Business Development Office, which works with colleagues in our Schools, is responsible for all academic collaborations with educational establishments (both within and outside the UK) regarding the delivery of teaching.

Our Student Admissions Team is responsible for appointing and managing the representatives who recruit students for us. A high proportion of representatives are based overseas.

Our Human Resources Team is responsible for recruiting all temporary and permanent staff and for supporting the management and development of staff.

One of our subsidiaries provides temporary and permanent work and internships for students, recent graduates and others both with the University and surrounding businesses.

### **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).

## **Staff Policies and Procedures**

We have a Whistle Blowing Policy which enables employees to raise concerns about any criminal offences or breaches of any legal obligations. During this financial year, no concerns were raised about allegations of slavery or human trafficking under that Policy.

We also have a Dignity at Work and Study Procedure which provides clear steps for managers and staff to follow when addressing bullying, harassment and victimisation at work or study and explains how all staff are expected to proactively contribute to a culture of mutual respect in which everyone is treated with dignity.

## **Suppliers**

We use Compass Group PLC to provide all catering and hospitality services on campus and they have implemented and are implementing comprehensive measures to eliminate slavery and human trafficking from their business and supply chains, including adherence to the nine point Ethical Trade Initiative (ETI) base code. Further details are set out in the Group's most recent slavery and human trafficking statement for its financial year ending on 30 September 2020.

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 monitor 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 introduced an additional check regarding the suppliers' measures on slavery and human trafficking. We also added evidence gathering questions to our in-house procedures for tenders and contracts.

Our Procurement Team continue to receive sector updates about modern slavery via purchasing consortia and forums to which they belong.

We have reviewed and will continue to review 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. No concerns have been identified during this financial year, but appropriate action will be taken to address any concerns we identify.

We pay to subscribe to the NETpositive Futures, a Supplier Engagement Tool which, amongst other things, enables us to meet our obligations on slavery and human trafficking. Having access to relevant information about our suppliers via this Tool more fully informs our decisions about the suppliers we do business with.

Wherever legitimately permitted, staff are required to procure ethical and Fairtrade goods and services as set out in our Sustainable Procurement Policy Statement.

We have added 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.

## **Educational establishments we do business with**

We use educational establishments (both within and outside the UK) to deliver our programmes (e.g. as a franchisee).

We undertake due diligence on educational establishments before we do business with them and our template due diligence questionnaire has been expanded to ensure we gather information about their approach to slavery and human trafficking at an early stage, including during any site visits.

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

Through periodic reviews, we take steps to ensure that the educational establishments are complying with their slavery and human trafficking obligations. Appropriate action will be taken to address any concerns we identify.

### **Representatives we do business with**

We use representatives (both within and outside the UK) to recruit students for our programmes.

Our contracts with representatives expressly prohibit any slavery or human trafficking within their businesses and supply chains and we only enter into new contracts with individuals or organisations who have provided us with written declarations confirming that there is no slavery or human trafficking within their business or supply chains.

Through periodic reviews, we take steps to ensure that the representatives are complying with their slavery and human trafficking obligations. Appropriate action will be taken to address any concerns we identify.

### **Recruitment service for students, recent graduates and others**

We operate, through one of our subsidiaries, a campus-based recruitment service as a franchisee of Warwick University which is called 'Unitemps'. Unitemps provides temporary and permanent work and internships for students, recent graduates and others both with the University and surrounding businesses. No commission is payable to staff working in Unitemps and all revenue earned from Unitemps is reinvested in the University and its facilities. This means that staff are dedicated to providing the best service to clients and candidates.

Unitemps is committed to ensuring that any workers it supplies are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour or similar human rights abuses. In this respect it has established and audited procedures to ensure that:-

- the workers have a right to work in the UK. This involves Unitemps asking to see their passports. A delay in providing the passport might indicate a modern slavery issue;
- where we are providing payroll services, as required by our own clients, we check that workers have a bank account in their own name into which their remuneration is paid; and
- where we are responsible for the workers whilst they are employed on our client's premises, they are free to leave their assignments on reasonable notice.

All workers have access to dedicated channels through which they may voice concerns.

### **Promoting employer vacancies to our students and graduates**

We encourage and help employers to promote their employment opportunities, and to provide insight, to our students and graduates, without charge.

Before working with an employer we carry out background checks using Financial Access Made Easy (FAME: which gives us access to public tax records for businesses, trading addresses, names of company directors etc), Companies House and Charities Commission (public online records of trading entities and registered charities). We also check the employer's web presence and reputation online to verify that they are genuine legal entities.

We state our vacancy guidelines, conditions of service and employer privacy notice on the online portal that employers use to register and log-in to use our free online vacancy promotion service and which students and graduates use to search for vacancies. We have a statement on the online portal to advise students and graduates to research all employers for whom they are considering working to assess their suitability and legality. We post contact details (direct telephone number and email and face-to-face addresses) for students and graduates to contact us if they are asked to pay any money to apply for a job.

## Training

We provide a training module on our online portal to give our staff an introduction to the risks of modern slavery and we have made completion of that module compulsory for staff who are working in risk areas.

Further information on Modern Slavery can be found at:

<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Approved by Governance, Nominations and Ethics Committee

The University of Salford



Signed by Andrew Hartley, Director of Legal and Compliance  
On behalf of Sam Plant, Chair of Governance and Nominations Committee