



## Modern Slavery Act Statement 2023/24

### 1. Introduction

- 1.1 The University of Sussex is an independent corporate body established by Royal Charter in 1961. It is an exempt charity under the meaning of the Charities Act 2011. The University is a leading teaching and research institution with annual income of around £300 million.
- 1.2 The University generates tuition fee income from its students, many of whom are in receipt of government funding, along with income from associated services such as student housing and catering. It attracts significant levels of research funding from industry, research councils Government and charities.
- 1.3 Figures for Student and Employee numbers can be found at [Facts and figures : Rankings and figures : About us : University of Sussex](#)

### 2. The Statement

- 2.1 This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our suppliers, students, staff, and the public about the University and its approach to modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supplychains.
- 2.2 The statement sets out the steps taken by the University to prevent forced labour and slavery in our supply chain, our own operations and through involvement with our business partners, and specifically highlights those taken in the financial year 2022/23. In line with Home Office guidance we aim to make progress over a period of time across a broad range of potential exposures and this year of reporting sets out the steps taken to address key risk areas. These are primarily focused around our conventional procurement activity and the active role that our staff play in procurement and our supply chain management; however, there has been some progress in widening the scope of our efforts to include the University's approach to its fixed asset investment management activity and HR policy in relation to temporary and casual staff engagements. This is consistent with a broader and longer-term intention to focus our actions in other areas of our business including contractual relationships and partnerships with other organisations that fall outside of the conventional procurement and supply chain activity.
- 2.3 Specific steps taken during the year include:
  - re-procurement of key Estates contracts (catering and facilities management), utilising an enhanced, ethical procurement approach in alignment with the Sustainable Principles Framework which supports the 19 UN Sustainable Development Goals (including eradication of slavery)
  - review of current Modern Slavery e-learning with a view to enhancing this module in 2023/24
  - publication of a revised Procurement and Purchasing Policy for 2023/24 and associated e-learning and guidance that makes our processes and requirements clear to those involved in purchasing on behalf of the University. This addresses the Act explicitly and ensures that our processes mitigate against associated risks
  - continued full and active membership of Electronics Watch, an independent monitoring

scheme for workers' rights within the worldwide electronics supply chain.

2.4 The University's supply chains mainly fall under four categories, which are:

- Science, Technical, Engineering and Medical Goods and Services
- Professional Services
- ICT Equipment and Services
- Estates Goods, Services and Works.

2.5 The principal areas which carry material risks are office supplies, laboratory consumables, ICT and AV equipment and some estates services, such as cleaning and security services. The majority of these items are purchased under the Southern Universities Procurement Consortium (SUPC) who fully support the Act. Their statement and further information on how they ensure compliance with the Act can be found via the link below:

- <https://www.supc.ac.uk/app/uploads/2022/03/202201-Modern-Slavery-Statement-for-Aug-2021-FINAL.pdf>

2.6 Many of the SUPC suppliers in these higher-risk areas will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) and SUPC work to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- 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, and
- no harsh or inhumane treatment is allowed.

2.7 These principles are underpinned by the University's contractual terms. Our terms and conditions are designed to be used for all companies with whom we contract and stipulate that the same terms apply to all parts of their associated supply chains. Wherever possible the University ensures that our terms and conditions are used but in instances where a supplier's terms are used, the University will conduct a full review to ensure that these principles are adhered to in full. For instances where terms are agreed with any foreign government or institution with whom the University contracts abroad, it will be ensured that equivalent terms exist within the contract. This process is defined in the University's Procurement and Purchasing Policy which can be found on the University's Procurement web pages via the link below:

- <https://www.sussex.ac.uk/finance/how/purchasing>

2.8 Other framework agreements are used to procure goods and services, including Crown Commercial Services, JISC, Crescent Purchasing Consortium and others. The University places reliance on these frameworks only to the extent that they explicitly state an approach to Modern Slavery and forced labour that is assessed by the University to be adequate. Otherwise, procurement projects and suppliers are assessed on a case by case basis through robust tender and ongoing contract management activity.

- <https://www.jisc.ac.uk/about/corporate/slavery-and-human-trafficking-statement>
- <https://www.thecpc.ac.uk/aboutus/sustainability.php>
- <https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing>

2.9 Compliance with the Act is incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of the University's terms and conditions which are explicit on our requirements under the Act. In instances or markets where a higher risk is identified, additional qualifying criteria will be included in any evaluation process.

Suppliers must proactively declare that they conform with the Act when they register with us and this is recorded within our supplier network database.

The University commits to developing deeper analysis of its supply chains and working towards enhanced transparency in these areas.

For the small number of live contracts already awarded prior to 2015 we continually review those which represent a medium-to high-risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, and partnering organisations, we will monitor those supply chains that have been identified as a potential risk and take appropriate action where necessary.

This statement has been approved and published by the Council of the University of Sussex and will be reviewed at least once annually.

Signed By:



Rosemary Martin  
Chair of Council  
University of Sussex

Date: 24<sup>th</sup> November 2023