

Modern Slavery and Human Trafficking Statement – 20 January 2021

In accordance with section 54 (1) of the Modern Slavery Act 2015, the University of Sunderland makes the following statement regarding the steps it has taken in the financial year 2019/20 to ensure that no modern slavery or human trafficking is taking place in any part of the organisation or its supply chain. Modern slavery in all its forms is a crime and the University of Sunderland is committed to understanding potential modern slavery and human trafficking risks and to improving the systems and controls in place to combat them.

Organisational Structure

The University of Sunderland is a Higher Education Corporation established by Order of the Secretary of State under Section 121 of the Education Reform Act 1988, the statutory purpose of the University is “to provide higher education and further education and to carry out research, and to publish the results of the research or any other material arising out of or connected with it in such a manner as the corporation shall think fit”.

The University, and all other Higher Education Corporations created by the 1988 Act, were granted the status of ‘Exempt Charities’. The Trustees of the exempt charity, the University of Sunderland, are the Members of the Board of Governors, which includes the Vice-Chancellor along with staff and student representatives. They have oversight of the management of the University, and ensure that in achieving its charitable obligations the University establishes and performs its strategic aims and objectives in ways which are consistent with the Office for Students’ guidance on the general principles of public benefit.

The University operates Campuses in Sunderland, London and in Hong Kong and also has a number of subsidiaries (companies all of which are wholly owned or effectively controlled by the University of Sunderland).

Due Diligence

The University does not tolerate modern slavery or human trafficking in any part of its business or its supply chain.

As part of our work to identify and mitigate risk we:

- Ensure that we have robust staff recruitment processes in place
- Have policies setting out how this issue is addressed within the business by members of staff, including a whistle blowing policy;
- Ensure that the University’s, partner institutions, Agents and Consultants comply with our values and so our Collaborative partnership Agreements include an obligation on our Partners to raise with us concerns or suspicions about modern slavery or human trafficking and to take similar steps with regard to their own supply chain;
- Require our new and continuing partners to agree to, and to ensure that their sub-contractors and supply chain agree with the Ethical Trading Initiative Base Code (‘ETI Base Code’), an internationally recognised code of labour practice, together with any anti-slavery measures notified by the University.

https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf

The ETI Base Code requires that;

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.

In furtherance of the enforceable obligation, the University may, acting by itself or through its audit agents, assess compliance with the implementation of these anti-slavery measures. Where the obligation is breached, the University may consider terminating its relationship with individuals or organisations if it reasonably believes that they are linked to modern slavery or human trafficking activities;

- Ensure that our tender processes require potential suppliers to confirm their adherence to anti-slavery and human trafficking principles, and our contracts contain appropriate clauses placing obligations on suppliers in relation to the prevention of modern slavery and human trafficking;
- Undertake much of our procurement via the NEUPC, one of six UK Higher Education purchasing consortia who deliver and manage a range of collaborative framework agreements utilised by the University. The NEUPC have developed an action plan to best address the risk of slavery and human trafficking in its supply chain by tackling slavery and human rights abuses in its supply chains, and to acquiring goods and services for its members without causing harm to others;
- Share best practice through the NEUPC Responsible Procurement Group which has the Modern Slavery Act 2015 as one of its main focuses;
- Have incorporated a contractual obligation to raise any concerns about the issue or suspicion of modern slavery in any parts of the institution or supply chain with the University Secretary and Director of Human Resources.
- We use a wide range of Fair Trade products including tea and coffee. The fair trade certification indicates that producers have been paid a fair price for their goods with safe working conditions.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our international supply chain, training has been and continues to be undertaken by relevant staff.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no modern slavery or human trafficking in our supply chain, we intend to take the following additional steps:-

- We will continue to require our Collaborative Partners to complete an annual declaration confirming their commitment to anti-slavery and human trafficking principals and work with them to encourage them to commit to the ETI Base Code;
- We will continue to undertake much of our procurement via the NEUPC;
- We will seek to identify higher risk current tendered suppliers and, where appropriate, require from them additional information about their attitude towards and commitment to anti slavery issues. Where necessary, we will work with them to embed best practice within their own processes and those of their suppliers;
- We will continue to review tendered suppliers' performance, through contract management and procurement guidance
- We will continue to promote the University's Public Interest Disclosure through our Whistleblowing Policy should anyone wish to raise a concern;
- We will promote Anti-Slavery Day on 18 October 2021
- We will collect feedback from those staff who have undertaken the modern slavery training and, informed by that, consider rolling out a version of this training to a wider cohort of staff.



Signed
Sir David Bell KCB
Vice Chancellor & Chief Executive
University of Sunderland

20 January 2021