

Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction from the Chair of the Board of Governors

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University's and its subsidiary companies' slavery and human trafficking statement for the financial year ending 31 July 2017.

Organisational structure

Southampton Solent University (SSU) is dedicated to providing university education in the UK higher education sector to approximately 11,000 full and part time students. The University is committed to enable learners from all backgrounds to become enterprising citizens and responsible leaders, while also promoting economic and social prosperity.

The University employs over 1,300 staff and ensures that it fulfils its obligations as an employer, and provides a range of services which support all employees.

The University has two subsidiary undertakings; a fully owned trading company, Southampton Solent University Limited (SSUL) and the charity Sport Solent in the Community (SSIC).

The main activities of SSUL are to provide short courses, training and facilities, consultancy services, meals and accommodation for employees of other organisations using the company's facilities for their own training programmes, and miscellaneous commercial activities. SSIC is a registered charity with the aim of benefitting the local community through the use of sports.

In 2016/17, the University's consolidated financial statements reported a turnover of £117,634k.

Our supply chains

The University procures a wide range of goods and services from a diverse and varied supply chain.

The Modern Slavery Act 2015 has introduced increasing focus on transparency in supply chains. As a result of this, SSU intends to carry out a University-wide risk assessment, clearly mapping the University's supply chains and identifying potential areas for modern slavery.

Our policies on slavery and human trafficking

Southampton Solent University is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The University's Modern Slavery and Human Trafficking Policy was implemented to ensure that all parts of its business and supply chain are slavery free. This policy demonstrates its commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

In addition, the University has a range of internal policies to ensure that it is operating in an ethical and transparent manner. These include:

- Sustainable and Ethical Procurement Policy. SSU is committed to being a socially responsible and environmentally conscientious organisation and this commitment extends to the principles that underpin its procurement. The University's approach to sustainable procurement is designed to support its Environmental Strategy and Ethical Investment Policy.

- **Statement on Ethical Investment.** SSU's ethical investment statement is based on the premise that the University's choice of where to invest should reflect the ethical values it espouses in public life, in particular its commitment to social justice. SSU will not knowingly invest in companies whose activities include practices which directly pose a risk of serious harm to individuals or groups, or whose activities are inconsistent with the mission and values of the University.
- **Equality and Diversity Scheme 2013.** The main policies that support equality, diversity and inclusivity in relation to students and employees at the University are Student Equality, Diversity and Inclusion Policy, Equality in Employment Policy and Behaviour at Work Policy Equal Opportunities policy. This Scheme enables the University to meet its general and specific duties under the Equality Act 2010. The Equality and Diversity e-learning module includes links to the Equality and Human Rights commission website.
- **Equality and Diversity Policy - Board of Governors.** The HE Code of Governance states that the governing body must promote equality and diversity throughout the institution, including in relation to its own operation.
- **Anti-bribery Policy.** This explains the procedures through which the University can maintain high ethical standards and protect its reputation against any allegations of bribery and corruption.
- **Whistleblowing Policy.** SSU is committed to social justice and to conduct its affairs in ways that are consistent with standards expected in public life. The Whistleblowing encourages and enables employees to raise serious concerns they may have within the University.

Due diligence processes for slavery and human trafficking

SSU undertakes relevant due diligence to ensure that the supplies it purchases are of good sustainable quality and ethically sourced.

In addition an action plan is regularly reviewed to identify the areas that the University needs to consider and the work to be undertaken to ensure that it is compliant with the Act. As part of the University's ongoing commitment to mitigate the risk of modern slavery occurring in its business and supply chains, it conducts appropriate risk assessments, reviews its supply chain policies and procedures.

The action plan enhances systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

SSU has zero tolerance to slavery and human trafficking. To ensure all those in its supply chain and contractors comply with its values and ethics, the University has rigorous selection, due diligence and tender processes.

The University continuously reviews its agreements and dealings with suppliers to ensure compliance with the anti-slavery measures. During the year, the University has been working with HE Shared Legal to incorporate a clause with regards to the Modern Slavery Act in its terms and conditions for all procurement contracts. This work will be completed by the end of 2017-18.

The University's trading arrangement form also now includes a question with regards to the Modern Slavery Act regulations and requires suppliers to provide links to their statements where appropriate.

There are dedicated University staff who are aware of the requirements of the Modern Slavery Act and the principle of human rights. The Director of International Office is currently reviewing the overseas agents' contracts.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in SSU's supply chains and its business, staff have attended a specialist training course run by BUFDG for the university sector. The University will also require our business partners to provide training to their staff, suppliers and providers.

Procurement staff have also attended a seminar to review the NetPositive Futures Supplier Engagement Tool, which is design to support and develop the supply chain. The tool includes content that specifically addresses the requirements of the Modern Slavery Act. Many of the University's current suppliers are registered on the tool, which would allow Procurement to focus on those not yet registered.

Our effectiveness in combating slavery and human trafficking

The University will know the effectiveness of the steps that it is taking to ensure that slavery and/or human trafficking is not taking place within its business or supply chain by monitoring any reports received from employees, the public or law enforcement agencies indicating that modern slavery practices have been identified.

KPI's will be reviewed as part of the Modern Slavery Act Action plan and implemented where appropriate.

Further steps

Following the introduction of the Modern Slavery Act 2015 in October 2015 the University developed an action plan to identify the areas that the University needs to consider and the work to be undertaken to ensure that we are compliant with the Act. Finance's Procurement Team have a planned away day in October, at which the action plan will be reviewed and updated.



**CHAIR OF BOARD OF GOVERNORS
SOUTHAMPTON SOLENT UNIVERSITY**

P. J. COTTON

Date: 22 November 2017

