

## 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 2025.

#### Organisational structure

Southampton Solent University (SSU) provides university education in the UK higher education sector and is committed to transforming the lives of people from all backgrounds, through learning that is relevant to the real world.

The University (Group) employs over 850 staff and ensures that it fulfils its obligations as an employer and provides a range of services which support all employees.

The University has four subsidiary undertakings; three fully owned trading company, Solent University Limited (SUL), Solent University Services Limited (SUSL) and Solent Skills Limited plus a joint venture Solent Pathway Campus Limited (SPCL).

The main activities of SUL 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.

SUSL is a fully owned subsidiary company which provides support and academic staff to the University.

Solent Skills Limited is a fully owned subsidiary which provides apprenticeship training staff to the University. Solent Skills Limited was set up on 4 November 2025 and has not traded in 2024/25.

SPCL provides foundation courses for overseas students, enabling the progression on to Solent undergraduate courses. The University owns 51% of the share capital, with the remaining 49% being owned by QAHE (Solent) Ltd.

In 2024/25, the University's consolidated financial statements reported a turnover of £102m.

#### 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 introduced increasing focus on transparency in supply chains. As a result of this, SU seeks to carry out procurement of goods and services in an environmentally, socially, ethically and economically responsible manner and to enter into agreements and contracts with suppliers that share and adhere to this commitment.

## **Our policies on slavery and human trafficking**

Solent University is committed to ensuring that there is no known 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 demonstrates its commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not knowingly 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.** SU 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 are inconsistent with the mission and values of the University.
- **Equality, Diversity and Inclusion.** The Six Pillars of Equality and Wellbeing was launched in June 2024, which brings together the University's commitments across various charters such as the Race Equality Charter, its EDI Plan and Mental Health and Wellbeing Vision.
- **The University has developed a clear commitment on EDI and a plan to create an inclusive environment.** The plan was created collaboratively with University staff and students and comprises of five strands; a clearly articulated commitment to the University's core value of inclusion; ambitions expressed as targets; accompanying actions; financial commitment; governance. The University's Equality and Diversity Policy ensures that the governing body 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.** SU 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 for its own contracts and engages with its purchasing consortium SUPC (Southern University Purchasing Consortium) to ensure ethical sourcing by incorporating checks to avoid slavery and human trafficking as part of the collaborative procurement activity.

## **Supplier adherence to our values**

SSU has zero tolerance to slavery and human trafficking.

The University continuously reviews its agreements and dealings with suppliers to ensure compliance with the anti-slavery measures. For all new and renewed procurement contracts a clause with regards to the Modern Slavery Act is included in the terms and conditions. In addition, during tender evaluations questions around the Modern Slavery Act are included and supplier's statements are reviewed.

The University's trading arrangement form refers to the Modern Slavery Act regulations and requires suppliers to provide links to their statements where appropriate.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in SU's supply chains and its business, staff are encouraged to attend specialist training courses run by the British Universities Finance Directors Group (BUFDG) for the university sector.

Staff across the University, have access to the BUFDG e-learning modules which includes Protecting Human Rights in the Supply Chain.

Training sessions were held with staff across the University to communicate the changes to the Public Procurement Regulations, which came into effect on 24 February 2025 and the implications on the University's processes.

In September 2024, the University launched an enhanced EDI module to promote a more inclusive and supportive community. The new EDI module reflects the University's shared commitment to creating and sustaining a culture of equity, inclusion, and belonging.

## **Our effectiveness in combating slavery and human trafficking**

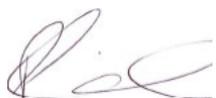
The University will investigate any reports received from employees, the public or law enforcement agencies indicating that modern slavery practices have been identified.

## **Further steps**

Following the launch of the University's Six Pillars of Equality and Wellbeing substantial progress was made in embedding equality & wellbeing into staff-related initiatives, alongside the University's continued momentum in fostering a more inclusive and supportive working environment. The University aims to supporting deeper integration of equality & wellbeing into the University's culture and operations, ensuring that future actions are both meaningful and measurable.

The University continues to mitigate the risk of modern slavery and human trafficking within its own staff community by following fair staff recruitment and selection policies and procedures. The implementation of the University's new ERP system, Solent Connect, will improve the recruitment process through the automation of information and enhanced reporting.

The challenge of modern slavery and human trafficking is one that is best addressed through the ongoing and proactive engagement with suppliers. During 2024/25, the University's Procurement team reviewed and updated policies and procedures, together with documentation, in line with the changes to the Public Procurement Regulations. The team continued to actively share experience and best practice through the Southern Universities Purchasing Consortium (and wider professional networks such as HEPA (Higher Education Procurement Association)). Staff across the University, particularly those in the Contract Management team and working on the construction side of projects liaise with Procurement to ensure process are followed, with internal regulations and policies readily available on the University's portal.



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

**Date: 9 December 2025**