

BIRMINGHAM CITY UNIVERSITY

Modern Slavery Act 2015

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.

Birmingham City University has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, and where possible, in our supply chain pursuant to Section 54 part 6 of the Modern Slavery Act 2015.

University History and current Structure:

Birmingham City University has a rich and varied history dating back to 1843 which can be traced back to the five individual colleges which would be brought together before becoming City of Birmingham Polytechnic. In 1992 it was awarded the power to adopt the title University and therefore became known as the University of Central England in Birmingham. Birmingham City University became a legal entity in 2007.

The University has an enviable reputation for providing quality, student- focused education in a professional and friendly environment and is split into four Faculties:

The Faculty of Arts, Design and Media
The Faculty of Business, Law and Social Sciences
The Faculty of Computing, Engineering and the Built Environment
The Faculty of Health, Education and Life Sciences

These are supported by a Professional Services function including areas such as Information Technology, Human Resources, Finance and Estates and Facilities. We currently have 24,000 students and an annual turnover of £210 million.

Our Policies

The University operates policies that seek to mitigate the risks of modern slavery and human trafficking within its own staff community by using only specified, reputable employment agencies to source labour and verifying the practices of any new agency it proposes to use before accepting workers from that agency. The University also has a Whistleblowing (Disclosure in the Public Interest) Policy which encourages all workers, customers and other business partners to report any concerns relating to the direct activities or the supply chains of the university including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our Sustainable and Ethical Procurement Process is committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The University works with

suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the University's supplier code of conduct may lead to the termination of the business relationship.

Birmingham City University's Supply Chain

Fundamental to our ethical conduct is assisting with the eradication of unethical business practices, including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour. Procurement processes must seek to protect the interests of the University by ensuring that all conflicts of interest are identified and acted upon. To this end, at the start of a Procurement activity, all Stakeholders involved in the process are requested to complete a Declaration of Interest form in relation to the potential tenderers. The stakeholder must also advise if a conflict arises following the notification of final respondents. In addition, tenderers are requested to declare any conflict of interest with the University as part of their tender submission.

Birmingham City University is committed to ethical procurement and therefore requires contractors who are able to demonstrate, support and abide by our efforts in achieving the organisations environmental and ethical objectives as laid out in our Sustainable Procurement Policy.

<http://www.bcu.ac.uk/about-us/corporate-information/environment-sustainability/sustainable-procurement>

The University's supply chains are managed under four 'Super-categories':

- Travel and Utilities
- ICT equipment and services
- Estates goods, services and works
- Professional Services

Our assessment at this time is that the principal areas which carry material risks are office supplies, laboratory consumables, uniforms, ICT and AV equipment and some estates services such as cleaning, catering and security services.

The Procurement team is responsible for ensuring that the Modern Slavery Act and its requirements are incorporated in procurement projects where appropriate, and that the University's supply chain is managed holistically as part of the category management process, and also on a contract by contract basis.

The University is aware that in some situations students can have agreements that they have freely entered into which mean they are required to work for a period following completion of their studies.

Effectiveness and Further steps

Over the next 12 months we will continue to develop and enhance our systems, processes and controls to further mitigate the risks of modern slavery and human trafficking within our supply chains. This will be achieved through

- The introduction of a Modern Slavery and Human Trafficking Policy

- Raising staff awareness of modern slavery and human trafficking more explicitly through our staff policies
- Providing staff with access to on-line training on Modern Slavery and human trafficking.

The University will periodically review the effectiveness of the policies, training and other measures taken to combat modern slavery and human trafficking.

Statement

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement for the financial year ending 2018. This statement will be reviewed and updated on an annual basis.

Director of Human Resources

Birmingham City University
July 2017

Policy approved by the University's Board of Governors on 20 July 2017.