# Modern Slavery Act 2015

## Introduction

This modern slavery statement outlines Birmingham City University's commitment to being an ethically and socially responsible organisation.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, debt bondage, forced 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. The University is committed to ensuring its practices combat slavery and human trafficking within its supply chains. The University is committed to acting ethically and with integrity in all its business dealings and relationships. The University will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in its own business, and where possible within its supply chain, pursuant to Section 54 (1) of the Modern Slavery Act 2015.

Management at all levels are responsible for ensuring those reporting to them are aware of and comply with this statement. All University employees will have responsibility for upholding the statement principles.

**Organisational Structure**

Brimingham City University is a provider of educational and research services within the Higher Education sector. The University operates primarily from two main campuses, with additional sites located throughout the city and is made up of six schools, plus the Royal Birmingham Conservatoire collectively sharing the organisational mission to be the inclusive Higher Education employer of choice in the region that attracts, empowers, engages and retains the best people; reflecting the diversity of the city. The University currently has c. 31,000 students, 2910 staff and an annual turnover in 2024/25 of £336m.

## University Policies

Birmingham City University is committed to making sure that all employees, are treated with respect and dignity and in accordance with its values. This includes, ensuring that working conditions and arrangements are safe, working hours are not excessive, and that individuals are properly compensated for their effort. The University will also seek to encourage compliance with such matters, amongst external partners and those organisations that the University engages with.

The University operates policies that seek to mitigate the risks of modern slavery and human trafficking within its own employee community by using only specified, reputable employment agencies to source labour.

The University also has a Whistleblowing (Disclosure in the Public Interest) Policy (https://www.bcu.ac.uk/about-us/corporate-information/policies-and-procedures) 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. Where University employees have such concerns, these should as soon as possible, be raised in the first instance with their line manager.

The University's Sustainable Procurement process encourages its suppliers to adhere to the highest standards of ethics.

The University works with suppliers to ensure that they meet the standards of the University's supplier code of conduct. Serious violations of the code may lead to the termination of the business relationship.

## Birmingham City University's Supply Chain

Birmingham City University is committed to ensuring there is no modern slavery or human trafficking in any of its supply chains or in any part of the University's business.

Fundamental to the University's 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 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 to demonstrate, support and abide by its efforts in achieving the organisation's environmental and ethical objectives as laid out within the Sustainable Procurement process.

https://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

The University's 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.

In support of this, the University's Procurement team has a Contract Management Toolkit which also addresses Modern Slavery as part of the management of contracts and supports training to relevant employees across the University.

The University is of course 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. The University will aim to raise awareness of the risk of modern slavery amongst its student as well as its employee populations.

## Effectiveness and Further steps

The University will continue to develop and enhance its systems, processes, and controls to mitigate the risks of modern slavery and human trafficking within its supply chains. This will be achieved through:

- The further review of the University's People and Culture policies to ensure the policies assist in minimising the risk of modern slavery and human trafficking.
- Continued awareness-raising amongst employees regarding modern slavery and human trafficking including at induction.
- The consistent and effective use of the University's recruitment and selection policy and procedures.
- Providing staff with access to on-line training relating to Modern Slavery and human trafficking.

The University will also 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 Birmingham City University's Slavery and Human Trafficking Statement for the financial year ending 2026.

This statement will be reviewed and updated on an annual basis.

**Alan Fitzgerald, Director of People Operations**

**Birmingham City University November 2026**