



Modern Slavery Act Statement 2025/26

1. Introduction

- 1.1 The University of Sussex is an independent corporate body established by Royal Charter in 1961. It is an exempt charity under the meaning of the Charities Act 2011. The University is a leading teaching and research institution with annual income of around £380 million.
- 1.2 The University generates tuition fee income from its students, many of whom are in receipt of government funding, along with income from associated services such as student housing and catering. It attracts significant levels of research funding from industry, research councils, Government and charities.
- 1.3 Figures for Student and Employee numbers can be found at [Facts and figures : Rankings and figures : About us : University of Sussex](#)

2. The Statement

- 2.1 This statement is designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015, by informing our suppliers, students, staff, and the public about the University and its approach to modern slavery, human trafficking, forced and bonded labour, and labour rights violations in its supplychains.
- 2.2 The statement sets out the steps taken by the University to prevent forced labour and slavery in our supply chain, our own operations and through involvement with our business partners, and specifically highlights those taken in the financial year 2024/25. In line with Home Office guidance we aim to make progress over a period of time across a broad range of potential exposures and this year of reporting sets out the steps taken to address key risk areas. These are primarily focused around our conventional procurement activity and the active role that our staff play in procurement and our supply chain management; however, there has been some progress in widening the scope of our efforts to include the University's approach to its investment management activity and HR policy in relation to temporary and casual staff engagements.
- 2.3 Specific steps taken during the year include:
 - Appointment of a new strategic partner (OCS) to the Sussex Estates and Facilities (SEF) Partnership, following an enhanced, ethical procurement approach in alignment with the University's Sustainable Principles Framework which supports the 19 UN SDGs (including eradication of slavery). This includes various enhancements both within SEF's own operations as well as the due diligence of its supply chain.
 - Appointment of a new managed service provider (Adecco) for all temporary and casual staffing engagements. The new contract includes enhancement to the efficiency and

effectiveness of right to work checks, mitigating risk in this area.

- Continued use of our supply chain due-diligence tool, Comply Advantage, which actively monitors all of the University's suppliers on a weekly basis and flags any potential issues around Modern Slavery, Sanctions and other pertinent risk factors.
- Continued full and active membership of Electronics Watch, an independent monitoring scheme for workers' rights within the worldwide electronics supply chain.
- mandatory Modern Slavery e-learning module for specific roles including staff who are involved in purchasing or authorizing purchases on behalf of the University

2.4 The University's supply chains mainly fall under four categories, which are:

- Science, Technical, Engineering and Medical Goods and Services
- Professional Services
- ICT Equipment and Services
- Estates Goods, Services and Works.

2.5 The principal areas which carry material risks are office supplies, laboratory consumables, ICT and AV equipment and some estates services, such as cleaning and security services. The majority of these items are purchased either via The University's Facilities management LLP or under the Southern Universities Procurement Consortium (SUPC) who fully support the Act. Their statement and further information on how they ensure compliance with the Act can be found via the link below:

- [2023-24-SUMS-Group-Modern-Slavery-Statement_final.pdf \(supc.ac.uk\)](#)

2.6 Many of the SUPC suppliers in these higher-risk areas will be asked to commit to the Base Code of the Ethical Trading Initiative (ETI) and SUPC work to persuade all suppliers in these categories to support these initiatives. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice, requiring that:

- employment is freely chosen
- freedom of association and the right to collective bargaining are respected
- working conditions are safe and hygienic
- child labour shall not be used
- living wages are paid
- working hours are not excessive
- no discrimination is practiced
- regular employment is provided, and
- no harsh or inhumane treatment is allowed.

2.7 These principles are underpinned by the University's contractual terms. Our terms and conditions are designed to be used for all companies with whom we contract and stipulate that the same terms apply to all parts of their associated supply chains. Wherever possible the University ensures that our terms and conditions are used but in instances where a supplier's terms are used, the University will conduct a full review to ensure that these principles are adhered to in full. For instances where terms are agreed with any foreign government or institution with whom the University contracts abroad, it will be ensured that equivalent terms exist within the contract. This process is defined in the University's Procurement and Purchasing Policy which can be found on the University's Procurement web pages via the link

below:

- <https://www.sussex.ac.uk/finance/how/purchasing>

2.8 Other framework agreements are used to procure goods and services, including Crown Commercial Services, JISC, Crescent Purchasing Consortium, NHS SBS and others. The University places reliance on these frameworks only to the extent that they explicitly state an approach to Modern Slavery and forced labour that is assessed by the University to be adequate. Otherwise, procurement projects and suppliers are assessed on a case by case basis through robust tender and ongoing contract management activity.

- <https://www.jisc.ac.uk/about/corporate/slavery-and-human-trafficking-statement>
- <https://www.thecpc.ac.uk/aboutus/sustainability.php>
- <https://www.crowncommercial.gov.uk/news/tackling-modern-slavery-what-ccs-is-doing>
- <https://www.sbs.nhs.uk/app/uploads/NHS-SBS-Modern-Slavery-Statement-24-March-2025.pdf>

2.9 Compliance with the Act is incorporated into the pre-qualification criteria for all tendered activity as well as full acceptance of the University's terms and conditions which are explicit on our requirements under the Act. In instances or markets where a higher risk is identified, additional qualifying criteria will be included in any evaluation process.

Suppliers must proactively declare that they conform with the Act when they register with us and this is recorded within our supplier network database.

All suppliers engaged will be monitored using the 'Comply Advantage' tool to monitor any modern slavery, human trafficking, forced and bonded labour, and labour rights violations. Working with our suppliers, and partnering organisations, we will monitor those supply chains that have been identified as potential risk areas and take appropriate action where necessary.

This statement has been approved and published by the Council of the University of Sussex and will be reviewed at least once annually.

Signed By



Rosemary Martin
Chair of Council
University of Sussex