

### Modern Slavery Act Statement 2022/23

#### 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 £300 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 The University of Sussex has 18,601 students (2021/22 full-time equivalent figures), of which around one-fifth are postgraduates. 70% of our student population are UK students and 30% are overseas students.
- 1.4 In 2020/21 the University employed 3,490 staff which is equivalent to 2,555 full time employees. This incorporated 1,755 staff in a Teaching or Teaching and Research role (equivalent to 1,070 full time employees). Other staff were employed in Research only or Professional Services positions (HESA 2020/21).

#### 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 2021/22. 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 fixed asset investment management activity and HR policy in relation to temporary and casual staff engagements. This is consistent with a broader and longer-term intention to focus our actions in other areas of our business including contractual relationships and partnerships with other organisations that fall outside of the conventional procurement and supply chain activity.
- 2.3 Specific steps taken during the year include:
  - Reconfiguration of the University's Supplier Management (SRM) Tool to provide better quality supplier data throughout the supply chain.
  - Restructuring of the Procurement function which now includes dedicated Contract Management and Supply Chain performance teams reporting into a new position of Head of Operational Procurement and Supply Chain Management, giving the University trained and dedicated resource to continually monitor the University's supply chain as well as monitoring any off-contract spend.
  - Implementation of a single managed service for Temporary and Casual staff. This service provides the University with a standardised service for engaging staff and ensures robust

and consistent recruitment measures are in place across the University's entire workforce.

- Review of current Modern Slavery e-learning with a view to enhancing this module in 2022/23
- Publication of a revised Procurement and Purchasing Policy for 2021/22 and associated e-learning and guidance that makes our processes and requirements clear to those involved in purchasing on behalf of the University. This addresses the Act explicitly and ensures that our processes mitigate against associated risks
- Continued full and active membership of Electronics Watch, an independent monitoring scheme for workers' rights within the worldwide electronics supply chain.

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 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:

- <https://www.supc.ac.uk/app/uploads/2022/03/202201-Modern-Slavery-Statement-for-Aug-2021-FINAL.pdf>

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 Purchasing Policy which can be found on the University's Procurement web pages via the link below:

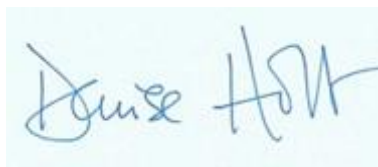
- <https://www.sussex.ac.uk/finance/how/purchasing>
- 2.8 Other framework agreements are used to procure goods and services, including Crown Commercial Services, JISC, Crescent Purchasing Consortium and others. The University places reliance on these frameworks only to the extent that they explicitly 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>
- 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.

The University commits to developing deeper analysis of its supply chains and working towards enhanced transparency in these areas.

For the small number of live contracts already awarded prior to 2015 we continually review those which represent a medium-to high-risk of 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 a potential risk 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.



Dame Denise Holt  
Chair of Council  
University of Sussex

29 November 2022