

## **Modern Slavery Act 2015 Statement for financial year ending Monday 31 July 2023**

### **Introduction**

This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that the University of Salford has taken during its financial year 2022/23, or will thereafter be taking, to ensure that no slavery or human trafficking is taking place within any part of its business or any of its supply chains.

This statement covers the university and its subsidiaries through which its activities are carried out and references to “we” and “us” are to be construed accordingly.

### **Organisation Structure**

The university is incorporated by Royal Charter and is an exempt charity.

The University Council (our supreme governing body) is responsible for the management and administration of our revenue and property and for our business and strategic direction.

The University Senate (which reports to the University Council) is responsible for maintaining the academic quality and standards of our awards and the learning experience of our students.

The Vice-Chancellor is responsible for day-to-day leadership and management of our business and leads the development and delivery of our vision and strategy.

### **Our policy**

We are committed to maintaining the highest ethical standards and to ensuring that no slavery or human trafficking is taking place in any part of our business or supply chains. Work is underway on a stand-alone university policy to reflect our commitment and to embed appropriate processes and procedures into our operations.

We comply with all legislation and regulatory requirements in relation to slavery and human trafficking. Everyone in our business is required to uphold the highest standards of integrity in their business activities and to comply with all applicable laws of the United Kingdom and other countries in which they are working.

### **Our business and supply chains**

We have approximately 25,000 students, 2,500 employees and operate from 3 campuses in Salford: Peel Park, Frederick Road and MediaCity.

We deliver higher education courses within the United Kingdom and overseas (this can be direct or through other educational establishments, such as universities and further education colleges, with whom we collaborate). We also undertake research and enterprise activities.

We are organised into 4 schools (Health and Society; Science, Engineering and Environment; Arts, Media & Creative Technology and Business) with supporting professional directorates.

We procure a wide range of goods and services and maintain relationships with a network of representatives in the United Kingdom and overseas for the recruitment of students.

We aim to identify and only do business with suppliers and organisations whose values and standards match our own. We expect all suppliers and organisations we do business with to adopt and enforce equivalent policies in their own operations and to encourage their own suppliers to do the same.

Were we to identify any concerns or areas for improvement we would in the first instance work with relevant suppliers, representatives and educational establishments to ensure they were satisfactorily addressed and would then monitor them to ensure continued compliance. As a last resort, we would seek to terminate relationships with anyone who refused to take remedial action or who failed to share our policy of zero tolerance of slavery and human trafficking.

### **Assessment of areas of risk**

We have assessed our business areas and supply chains and consider the following of them to be the most likely to give rise to a risk of slavery or human trafficking:

- Recruitment of staff (particularly those involved with cleaning/security/catering/hospitality)
- Recruitment and support of students
- Supplies of office furniture/equipment/stationery
- Supplies of clothing and footwear (including workwear)
- Supplies of foodstuffs/beverages
- Supplies of information and communications technology/audio visual equipment

### **Key responsibilities**

Our centralised Procurement Team is responsible for approving all new suppliers and for issuing tenders for goods and services above a specified threshold. The majority of transactional purchasing is devolved to individual departments which are required to comply with our purchasing policies and procedures. We have continued to raise the awareness of these individual departments of the risk of slavery or human trafficking in the above business areas.

Our Academic Business Development Office, which works with colleagues in our Schools, is responsible for all academic collaborations with educational establishments (both within and outside the UK) regarding the delivery of teaching.

Our Student Admissions Team is responsible for appointing and managing the representatives who recruit students for us. A high proportion of representatives are based overseas.

Our Human Resources Team is responsible for recruiting all temporary and permanent staff and for supporting the management and development of staff.

One of our subsidiaries provides temporary and permanent work and internships for students, recent graduates and others both with the university and surrounding businesses.

### **Recruitment of staff**

We have robust recruitment processes in place and were the first university in the North West of England to sign up to the National Living Wage – an improved rate of pay scheme which exceeds the National Minimum Wage.

We comply fully with all applicable legislation (this includes limits on working hours).

## **Staff policies and procedures**

We have a Whistle Blowing Policy which enables employees to raise concerns about any criminal offences or breaches of any legal obligations. During this financial year, no concerns were raised about allegations of slavery or human trafficking under that Policy.

We also have a Dignity at Work and Study Procedure which provides clear steps for managers and staff to follow when addressing bullying, harassment and victimisation at work or study and explains how all staff are expected to proactively contribute to a culture of mutual respect in which everyone is treated with dignity.

## **Recruitment and support of students**

University students struggling financially can be vulnerable to modern slavery. As a result of the general economic conditions prevailing, growing numbers of students lack financial resources whilst at university. This may result in increased vulnerability to exploitation which may in turn result in modern slavery, for example in areas of forced sexual exploitation and county lines.

International students can be particularly vulnerable to modern slavery for three key reasons:

1. A lack of cultural awareness can increase risk for students studying abroad.
2. Student visas can be used to facilitate human trafficking.
3. International students can become vulnerable to perpetrators offering them a job without legal proof of the right to work if they remain in the country with an expired visa after study, although the UK government has now granted a two-year graduate work visa extension to international students, which may reduce this element of vulnerability.

We do recognise that international student recruitment can be an area of high risk, and have taken measures such as close selection and management of our international recruitment agents, procedures for support regarding wellbeing and the banning of unpaid student internships.

The university has in place specific support for under 18 year old students, many of whom are international, as we recognise the potential vulnerability of this group of students. This includes ensuring that each student has a guardian in place to support them during their studies in addition to them having regular one to one check in meetings with key staff at the university. We ensure that these students have access to information about support available to them, especially during key times of year such as Christmas, when the university closes for a short time.

All students have access to a range of support whilst at university, which is promoted on various platforms throughout the year. This includes Counselling and Wellbeing, askUS (housing, finances, general student queries) and our Respect, Culture and Behaviours team who manage the university's Report and Support platform, where students can report a range of issues such as bullying and harassment, sexual harassment and hate crime. Students with disabilities can also access support from the Disability and Inclusion Service.

The Students' Union also offers a range of support for students including peer support through the Rafiki on-line chat service and housing advice.

## **Suppliers**

We use existing framework agreements of regional higher education purchasing consortia (e.g. North Western Universities Purchasing Consortium (of which we are a member) and North Eastern Universities Purchasing Consortium) for the purchase of certain types of goods and services. We monitor the steps taken or being taken by those consortia with their panels of suppliers in respect of slavery and human trafficking.

New suppliers must be approved by our Procurement Team before purchases can be made from them and, as part of the approvals process, we introduced an additional check regarding the suppliers' measures on slavery and human trafficking. We also added evidence gathering questions to our in-house procedures for tenders and

contracts.

Our Procurement Team continue to receive sector updates about modern slavery via purchasing consortia and forums to which they belong.

We have reviewed and will continue to review our existing suppliers in the areas we assess as being 'at risk' to check the steps they have taken and are taking to eliminate slavery and human trafficking from their business and supply chains. No concerns have been identified during this financial year, but appropriate action will be taken to address any concerns we identify.

We pay to subscribe to the NETpositive Futures, a Supplier Engagement Tool which, amongst other things, enables us to meet our obligations on slavery and human trafficking. Having access to relevant information about our suppliers via this Tool more fully informs our decisions about the suppliers we do business with.

Wherever legitimately permitted, staff are required to procure ethical and Fairtrade goods and services as set out in our Sustainable Procurement Policy Statement.

We have added an express obligation on slavery and human trafficking to our standard terms and conditions of purchase and our consultancy agreements and, where applicable, will also require suppliers to take similar steps in respect of the sub-contractors they use.

#### **Educational establishments we do business with**

We use educational establishments (both within and outside the UK) to deliver our programmes (e.g. as a franchisee).

We undertake due diligence on educational establishments before we do business with them and our template due diligence questionnaire has been expanded to ensure we gather information about their approach to slavery and human trafficking at an early stage, including during any site visits.

We have an express obligation on slavery and human trafficking in our template agreements with educational establishments and, where applicable, require educational establishments to take similar steps in respect of the sub-contractors they use.

Through periodic reviews, we take steps to ensure that the educational establishments are complying with their slavery and human trafficking obligations. Appropriate action will be taken to address any concerns we identify.

#### **Representatives we do business with**

We use representatives (both within and outside the UK) to recruit students for our programmes.

Our contracts with representatives expressly prohibit any slavery or human trafficking within their businesses and supply chains and we only enter into new contracts with individuals or organisations who have provided us with written declarations confirming that there is no slavery or human trafficking within their business or supply chains.

Through periodic reviews, we take steps to ensure that the representatives are complying with their slavery and human trafficking obligations. Appropriate action will be taken to address any concerns we identify.

#### **Training**

We provide a training module on our online portal to give our staff an introduction to the risks of modern slavery and we have made completion of that module compulsory for staff who are working in risk areas.

## Achievements 2020 – 2023

- Via NWUPC we are affiliates of Electronics Watch who assist public sector organisations to monitor rights of workers in the electronics industry.
- We continued to make MSA training a mandatory training module for all new starters.
- We continued to identify modern slavery risks within our supply chains and act to remove these, with the support of our suppliers.
- We further developed the commitment of contractors to risk assessing their supply chains during the course of their contracts through the use of the Net Positives tool.

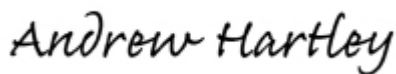
## Plans for 2023/24

- Raise the profile of Modern Slavery at the University of Salford through training and awareness events.
- Review our Modern Slavery Statement and continue to develop our policies and processes in line with good practice and procedures, especially those relating to student welfare and support.
- Review the risks of modern slavery within our International Partnerships.
- Survey our supplier base to identify those who pay the Living Wage accredited rate and include the requirement for all suppliers to pay this rate in future contracts as part of the procurement process if possible.
- Assess the benefits for using the Modern Slavery Assessment Tool (MSAT) introduced by Crown Commercial Services (CCS) for the Public Sector.

Further information on Modern Slavery can be found at the [UK legislation](#) website.

Approved by Governance, Nominations and Ethics Committee, The University of Salford.

Signed by:



Andrew Hartley, Director of Legal and Compliance Services, University of Salford  
On behalf of Sam Plant, Chair of the Governance, Nominations and Ethics Committee

Date: Thursday 7 December 2023