

SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nottingham Trent University's (NTU) slavery and human trafficking statement for the financial year ending 31 July 2020.

Organisational Structure

Nottingham Trent University is a Higher Education Corporation established in accordance with the Education Reform Act 1988. It is a provider of education and research services and comprises the following:

- Nottingham Business School;
- Nottingham Law School;
- School of Animal, Rural and Environmental Sciences;
- School of Architecture, Design and Built Environment ;
- School of Art and Design;
- School of Art and Humanities;
- School of Science and Technology;
- School of Social Sciences;
- Confetti Media Group; and
- Together with the NTU Doctoral School, NTU in Mansfield and several professional services directorates.

The University has a global annual turnover in excess of £300 million and a procurement spend of £114 million.

The University also has a number of subsidiary companies through which its commercial activities are provided.

Workplace Policies

The University will not tolerate modern slavery or human trafficking in its supply chains or in any part of its business. It has employment policies and codes of conduct in place which have relevance to how this issue is addressed within its business by members of its staff.

In the light of the obligation to report on measures that seek to ensure that all parts of the University's business and supply chain are slavery free the University has reviewed its workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

These reinforce the University's commitment to acting ethically and with integrity in all its business relationships. To implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within the University.

Our Supply Chains

The University's supply chains are generally captured within the following categories:

- Estates, Facilities Management and Waste Services;
- Digital Technology (including hardware, software and services);
- HR and Professional Services;
- Catering Services;
- Libraries and Publications;
- Marketing, Print, Stationery and Travel; and
- Agricultural, Medical and Laboratory.

The sub-categories that carry a raised risk in terms of slavery and human trafficking have been assessed as:

- Construction works sub-contractors and supply chains;
- Estates hard and soft Facilities Management Services (such as maintenance, cleaning and security services);
- Labour Agencies;
- IS personal computers, laptops and multi-functional devices;
- Audio Visual (AV) equipment and products;
- Laboratory supplies;
- Workwear Clothing;
- Food production and supply; and
- Promotional Merchandise/Office Supplies/Stationery.

A wide range of products are procured across all of these sub-categories, some of which are sourced from international manufacturers operating in low-cost countries. For some of these sub-categories the University sources its requirements through Higher Education Purchasing and other Consortia framework agreements.

The U.K. Construction Industry is heavily regulated by statute in relation to Health & Safety, Employment Law, Building Regulations and similar. The Estates Procurement team makes regular use of established contractor screening processes when selecting companies to undertake works or services for the University.

Actions Completed in 2020

1. Development of Modern Slavery Information Materials

- Information materials continue to be used to raise general awareness for colleagues across the University and shared via the University's intranet.
- Colleagues are now strongly encouraged to complete the Higher Education Procurement Association (HEPA) Guide to Modern Slavery Course, as part of their induction process. This is also a mandatory requirement for all colleagues within the Procurement team.
- Slides providing an overview of Modern Slavery have been included within the Essential Purchasing Training, Purchasing Card Training and incorporated into the Staff Induction process.
- More detailed information materials are shared with key staff groups including Estates and Digital Technology. This incorporates sustainable development elements of the Modern Slavery Act for all colleagues completing the NTU Sustainable Awareness training.

2. Flexible Framework

The Flexible Framework monitors supply chain sustainability aspects including Modern Slavery. Following the original Flexible Framework external assessment carried out in July 2018 and reviewed in October 2020 the University continues to fulfil the requirements of Level 4. Due to the higher commitment required for Level 5, the highest Level obtainable, it has been decided not to progress at this stage and rather to focus on ensuring all parts of Level 4 are at their optimum. The Framework monitors supply chain sustainability aspects and feeds into our ISO14001 accreditation.

3. NETpositive Supplier Engagement Tool (SET)

The University continues to encourage its suppliers to use the NETpositive Supplier Engagement Tool (SET), a database system which collects information from suppliers on sustainability issues, including Modern Slavery and Human Trafficking.

There are currently 991 of the University's suppliers registered on the SET database. Out of these 967 (98%) have stated that they are aware of the Modern Slavery Act. The remaining suppliers are currently being contacted to engage with them and improve their awareness of Modern Slavery and Human Trafficking.

The University's Procurement Team continues to monitor suppliers' use of the SET and in particular the questions and actions relating to Modern Slavery. Going forward there are plans to investigate how many of the University's suppliers publish Modern Slavery statements themselves. Due to the amount of work this is likely to involve this may form a Scholarship Project for Undergraduate Researchers (SPUR) student project.

4. Consortia

The Procurement Team continues to work with the Higher Education Procurement Association (HEPA) and other Purchasing Consortia to incorporate Modern Slavery clauses into all new HE Framework contracts. Where framework agreements do not have appropriate Modern Slavery clauses NTU-specific additional clauses are included for use within mini-tenders.

5. Sector Best Practice

The University maintains awareness of work and best practice in the HE sector via the HEPA Responsible Procurement Working Group, of which it is an active member. Awareness of this issue from outside the sector is maintained by following the latest advice and recommendations published by the Chartered Institute of Purchasing and Supply (CIPS) regarding Modern Slavery and Human Trafficking in the supply chain.

6. Establishment of a Working Group

The Modern Slavery Group monitors progress and reports back to the Embracing Sustainability Strategy Board (ESSB). The Board, chaired by the Chief Operating Officer and Registrar, covers all areas of sustainable development, which includes modern slavery and human trafficking issues. Meetings take place five times per year.

In addition to overseeing any current and proposed actions the Modern Slavery Working Group includes the following areas in its scope:

- a) Monitoring the level of supply chain incidents reported including a review of remedial action taken where non-compliance may have been identified - none have been reported so far.
- b) Monitoring the number of NTU suppliers:
 - Registered with NETpositive; and
 - Actively using NETpositive for self-assessments.
- c) Developing proposals identifying appropriate levels of proactive checks or audits to be made on higher risk NTU supply chains, following analysis of current HE and public sector best practice.

d) Reviewing the potential benefits of other approaches, including:

- Continuing to work with HE Procurement Consortia or other organisations such as HEPA, to put in place appropriate sector-wide arrangements that NTU could 'call off' from as appropriate; and
- Working with Professor Ian Clark from the Nottingham Business School who has carried out research into the exploitation of individuals working in hand car washes in the Nottingham area. He has extensive knowledge of the issues around modern slavery and human trafficking via his research and work with the Gangmaster and Labour Abuse Authority.

Supply Chain Policies

The latest update of the Procurement Policy includes reference to the prevention of Slavery and Human Trafficking in the supply chain. The Supplier Code of Conduct expected of all University suppliers requires compliance with Modern Slavery legislation, as does the Sustainable Procurement Policy. In addition, standard contract terms and conditions and tender documents have been amended to reinforce this requirement. An appropriate Modern Slavery clause has been inserted into the Standard Conditions of Contract which are visible to suppliers on the Procurement website.

The University has clarified that colleagues with any concerns about potential modern slavery abuses could report this in two ways:

- Internally via the University's Whistle-blowing Policy to enable a confidential and comprehensive investigation to be undertaken; and/or
- Externally to the anonymous National Reporting Line at 0800 0121700, so that any concerns can be included in wider investigations by the relevant authorities into suspected abuses at a Regional and National level.

The University expects that all suppliers and contractors in its supply chain will comply with its values. To help ensure this the Procurement Department has the following processes in place:

- Controls within University procurement procedures to ensure that the tendering process for new suppliers and contractors and the management of the performance of, and relationship with, suppliers and contractors includes compliance with the University's policies, including policies relating to modern slavery and human trafficking; and
- Checks that similar provisions are contained within Higher Education Purchasing and other Consortia framework agreements used by the University. In the event that the University wished to use a framework agreement which did not contain such a protection, it would seek to include such a provision by negotiation.

Approved by the Board of Governors on 24 November 2020.



Signed by.....

Mr Neil Goulden, Chair of the Board of Governors