Modern Slavery Act 2015

Introduction
In accordance with the Modern Slavery Act 2015, the University of Sunderland makes the following statement regarding the steps it has taken in the financial year 2016/17 to ensure that no modern slavery or human trafficking is taking place in any part of the organisation or its supply chain. This statement sets out the actions taken by the University of Sunderland to understand potential modern slavery and human trafficking risks and to implement effective systems and controls.

Organisational Structure
The University of Sunderland is a Higher Education Corporation established by Order of the Secretary of State under Section 121 of the Education Reform Act 1988, the statutory purpose of the University is “to provide higher education and further education and to carry out research, and to publish the results of the research or any other material arising out of or connected with it in such a manner as the corporation shall think fit”.

The University, and all other Higher Education Corporations created by the 1988 Act, were granted the status of 'Exempt Charities' (as now defined in the Charities Act 2011, Section 22). The Trustees of the exempt charity, the University of Sunderland, are the Members of the Board of Governors, which includes the Vice-Chancellor along with staff and student representatives. They have oversight of the management of the University, and ensure that in achieving its charitable obligations the University establishes and performs its strategic aims and objectives in ways which are consistent with the Charity Commission’s guidance on the general principles of public benefit.

The University also has 11 subsidiaries (companies all of which are wholly owned or effectively controlled by the University of Sunderland).

Due Diligence
To ensure that the University’s contracted suppliers and partner institutions comply with our values, we have incorporated a contractual obligation to raise any concerns about the issue or suspicion of modern slavery in any parts of the institution or supply chain with the University’s Director of Human Resources, Legal and Governance. We require our partners to agree to, and to ensure that its sub-contractors and supply chain agree with the Ethical Trading Initiative Base Code (‘ETI Base Code’), an internationally recognised code of labour practice, together with any anti-slavery measures notified by the University.

The ETI Base Code requires that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. Living wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.
In furtherance of the enforceable obligation, the University may, acting by itself or through its audit agents, assess compliance with the implementation of these anti-slavery measures. Where the obligation is breached, the University may consider terminating its relationship with individuals or organisations if it reasonably believes that they are linked to modern slavery or human trafficking activities.

Training
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our international supply chain, training has been or is being undertaken by relevant staff.

Further Steps
Following a review of the effectiveness of the steps we have taken this year to ensure that there is no modern slavery or human trafficking in our supply chain, we intend to take the following additional steps:-

- We will work with our partners to encourage them to commit to the ETI Base Code;
- We will require relevant tenderers to submit evidence of their Modern Slavery Act compliance as part of all formal tender processes.
- We undertake much of our procurement via the NEUPC, one of six UK Higher Education purchasing consortia who deliver and manage a range of collaborative framework agreements utilised by the University. The NEUPC have developed an action plan to best address the risk of slavery and human trafficking in its supply chain by tackling slavery and human rights abuses in its supply chains, and to acquiring goods and services for its members without causing harm to others.
- We seek to promote the University’s Public Interest Disclosure through our whistleblowing policy should anyone wish to raise a concern
- Our tender processes require potential suppliers to confirm and demonstrate their adherence to anti-slavery and human trafficking principles, and our contracts contain appropriate clauses placing obligations on suppliers in relation to the prevention of modern slavery and human trafficking;
- We require our Collaborative Partners to complete an annual declaration confirming their continued commitment to anti-slavery and human trafficking principles.

Signed [Signature]

Shirley Atkinson
Vice-Chancellor & Chief Executive
University of Sunderland