

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 slavery and human trafficking statement for the financial year ended 31 July 2016.

Organisational Structure

Nottingham Trent University is a Higher Education Corporation established in accordance with the Education Reform Act 1988. We are a provider of education and research services and comprise three Colleges, each in turn hosting a number of Schools:

College of Business, Law and Social Sciences

- Nottingham Business School
- Nottingham Law School
- School of Social Sciences

College of Art, Architecture, Design and Humanities

- School of Architecture, Design and the Built Environment
- School of Art & Design
- School of Arts and Humanities

College of Science and Technology

- School of Science and Technology
- School of Animal, Rural and Environmental Sciences

together with The Doctoral School and a number of professional services directorates.

It has a global annual turnover of £258 million and a procurement spend of £103 million.

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

Our Supply Chains

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

1. HR and Professional Services
2. Libraries and Publications
3. Catering Services
4. Marketing, Print, Stationery and Travel
5. Information Systems, including hardware, software and services
6. Estates and Facilities Management
7. 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)
- Office supplies/stationery
- IS personal computers, laptops and multi-functional devices
- Audio Visual (AV) equipment and products
- Laboratory supplies
- Workwear Clothing
- Merchandise
- Food production and supply.

The majority of the University's demand for office supplies and laboratory consumables is fulfilled by the use of National and Regional agreements made available by the Higher Education Purchasing Consortia.

A wide range of products are procured across all of these sub-categories, many of which are sourced from international manufacturers operating in low-cost countries where modern forms of slavery are prevalent. The Consortia request that the suppliers in the highest risk areas commit to the Base Code of the Ethical Trading Initiative (ETI) and are working to persuade all suppliers in the above categories to commit to the Base Code.

A significant proportion of the University's demand for IS equipment and products, including parts and accessories is also fulfilled via National and Regional agreements made available by the Higher Education Purchasing Consortia. The Consortia support the principles of, and work closely with Electronics Watch and includes contract monitoring clauses created by Electronics Watch in all relevant agreements awarded by the Consortia and used by the University.

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.

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.

The workplace policies and procedures in place at the University demonstrate its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

It is the intention of the Head of Procurement at the University to update the procurement policy to include the prevention of Slavery and Human Trafficking in the supply chain. This will, in conjunction with the University's Procurement procedures, Code of Conduct and Supplier Relationship Management policy, ensure that the controls referred to in this Statement can be effectively introduced and monitored.

Due Diligence Processes for Slavery and Human Trafficking

The University's Procurement Department has completed an exercise to allow potential risks for slavery and human trafficking in its supply chains to be identified. The report enables the University to:

1. Identify and assess potential risk areas in its supply chains;
2. Mitigate the risk of slavery and human trafficking occurring in its supply chains;
3. Monitor potential risk areas in its supply chains; and
4. Protect whistle-blowers.

Examples of ways in which the University is achieving the above are through working with Electronics Watch to monitor and educate its IS and Audio Visual equipment suppliers. It has also recently signed up to the NETpositive Supplier Engagement Tool, a powerful database of data which collects information from suppliers on sustainability issues, including Modern Slavery and Human Trafficking.


This allows the University to engage with its suppliers to establish whether they are aware of the Modern Slavery Act 2015, or consider Modern Slavery to be an issue for their business and what, if any, pro-active action they are taking to respond to the Act.

Supplier Adherence to the University's Values

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:

- The procurement procedures include processes and guidance which enables the management of the University's supply chains and business practices from the evaluation, selection and appointment of suppliers and contractors and throughout the term of the relationship.
- Controls are in place within the procedures and the policy which 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 around modern slavery and human trafficking.
- This will be further supported by the University's terms and conditions of contract which are currently under review. These will include a specific clause in relation to the Modern Slavery Act which will include provisions whereby contracts can be terminated should a contractor breach such policies.
- Similar provisions are also 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.
- To ensure a high level understanding of the risks of modern slavery and human trafficking in our supply chains we intend to provide training for key members of staff based on a training needs analysis.

Approved by the Board of Governors on 21 November 2016.

Signed by 
Mr Neil Goulden, Chair of the Board of Governors