Modern Slavery and Human Trafficking Statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31st July 2022. Modern slavery is an overarching term to describe all forms of contemporary slavery including human trafficking, slavery, servitude, forced, bonded and child labour. This statement sets out the steps the University has taken, and will take in the coming year.

1. Organisational structure

Teesside University is a Higher Education Institution which provides a wide range of teaching, research, enterprise and related activities and as an exempt charity operates on a 'not for profit' basis. The Board of Governors is responsible for the educational character and mission of the University, for the management and administration of all of our resources and for our strategic direction. The Vice-Chancellor is responsible for the day-to-day leadership and management of the University and leads the development and delivery of our vision and strategy. The Audit Committee is responsible for overseeing University policies on all aspects of Governance and related activities.

2. Business

Our main campus is in the centre of Middlesbrough in the heart of the Tees Valley with an additional campus in Darlington. The University is organised into five academic schools which are supported by a number of professional services (non-academic) departments. We have 22,697 students registered on courses both in the UK and overseas and we employ over 2,900 staff and had an income of over £180m for the financial year ended 31 July 2022.

3. Policies

The University does not tolerate modern slavery or human trafficking in its supply chain or in any part of its business. It has employment policies and codes of conduct in place that 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.

We have a Modern Slavery Policy that applies to all persons working for us in any capacity including all employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

4. Assessment of areas of risk

We have assessed which of our business areas are most likely to give rise to a risk of slavery or human trafficking and whilst the University's supply chain is considered to be the highest risk other areas are:

- Recruitment of staff
- Students
- Representatives and educational establishments we do business with

5. Compliance Work Undertaken to Date

5.1 Supply chain

The highly varied activities of the University necessitate the management of a diverse supplier base delivering goods, services and works. The University's supply base spans several broad category areas including: Construction, Laboratory Equipment, Catering, Professional Services, ICT, Facilities Management and Laboratory and Office Consumables. Across these categories, the University engages with a range of suppliers including large corporations and SMEs, both locally and internationally. It is recognised that the risk of Modern Slavery occurring will vary across these supply categories and the level of risk may also be impacted by the supplier's size and location. For example, it is considered that larger UK registered suppliers, having a turnover in excess of £36m, may represent a lower risk of breaching the Modern Slavery Act as they themselves must publish an Annual Statement and they would be expected to raise awareness and drive compliance with the Modern Slavery Act in their organisations and their supply chains. The University has therefore developed a risk-based approach to mitigating the risk of Modern Slavery in its supply chain as follows:

- All quotation and tender processes include within the Standard Selection Questionnaire (SQ) a disclosure of compliance relating to Modern Slavery Act 2015. This ensures any quotations and tenders are assessing compliance to the Modern Slavery Act 2015 for each bidder.
- We have also undertaken a review of the Annual Statements on Modern Slavery for our main purchasing consortia, including the North East Universities

Purchasing Consortia (NEUPC) and The Universities' Catering Organisation (TUCO). Purchasing consortia exist to manage a robust procurement process, including appropriate due diligence, on behalf of their members. Our review of consortia policies and annual statements has provided evidence that the consortia are, and are working towards, integrating the requirements of the Modern Slavery Act into their processes. This provides assurance that any suppliers on their frameworks are likely to carry a lower risk of the occurrence of Modern Slavery.

- The University's Procurement Strategy and Procedures require that Modern Slavery is considered within our key priorities and supply chain selection.
- We have embedded compliance with the Modern Slavery Act 2015 within the University's purchasing terms and conditions and within procurement activities across the University. These terms and conditions are available on the University's web-site and all purchase orders include a link to them. For any contracts where the University's standard terms and conditions are not used we ensure that Modern Slavery clauses are included.
- We have ensured that an express obligation on slavery and human trafficking is included in our agreements with representatives and educational establishments (both home and overseas) and, where applicable, we also require representatives and educational establishments to take similar steps in respect of the sub-contractors they use
- We have identified our high risk categories and services and to ensure staff awareness we have also identified suitable on-line training and awareness courses for those staff who are encouraged to complete the training
- The Procurement team have completed these training courses which has been developed by Higher Education Procurement Association (HEPA) and British Universities Finance Directors Group (BUFDG).
- The University shares best practice through the NEUPC Responsible Procurement Group which has as one of its focuses the Modern Slavery Act 2015.
- The University has developed a supplier code of conduct for suppliers who fall under high risk areas for Modern Slavery. This code of conduct is issued with all standard procurement documents where market competition is sought.
- The University has promoted Anti Slavery day in 2022 and will continue to do so annually.
- The University has further enhanced its supplier risk assessment procedures, formalising this at project inception stage, and the risk assessment includes a Modern Slavery element as part of the overall perceived risk.

Our Modern Slavery and Human Trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing systems and controls that seek to ensure slavery and human trafficking is not taking place in our supply chains. Teesside University will not support or deal

with any business knowingly involved in slavery or human trafficking in any part of its operations.

We will assess any instances of non-compliance on a case-by-case basis and will take remedial action appropriately. We only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance. There have been no identifiable areas of non-compliance.

5.2 Recruitment of staff

We ensure that working conditions are safe and hygienic and working hours are not excessive.

We have a Public Interest Disclosure Policy (Whistleblowing) which enables employees to raise concerns about any criminal offences or breaches of any legal obligations.

We have robust recruitment processes in place and all potential employees who wish to work for Teesside University must complete the following checks prior to being appointed;

- Proof of eligibility to work in the UK in accordance with the Asylum and Immigration Act 1996
- Unspent convictions
- Health Declaration
- Disclosure and barring service identity form (dependent on the role applied for)

The University pays the Living Wage which is an approved rate of pay in excess of the Minimum Wage.

Temporary staff are only engaged through established sources (recruitment agencies and directly), who comply with legislation relating to rights and welfare of their candidates and employees.

All staff must confirm annually they have read and understood our Modern Slavery Policy and Statement.

5.3 Students

Although the risk of students experiencing occurrences of modern slavery or human trafficking through direct contact with the University is extremely low, it is recognised that, whilst living in Teesside and the surrounding area, they may become aware of such instances or, on very rare occasions, be entrapped into adopting the life style of a modern slave. In order to mitigate these circumstances the University has in place easily accessible and established channels through which students can obtain assistance, support and advice on their wellbeing.

Applicants for courses which require a check by the Disclosure and Barring Service (DBS) are required to declare any criminal conviction at application stage. These

include nursing and other health profession courses, as well as Teacher Training and education courses. Potential students, registering on non-DBS courses, are required to declare if they have a relevant criminal conviction when they register at the University. These declarations are sent to Legal & Governance Services for consideration.

All students who receive a firm offer of a place on a full time course are invited to apply for University accommodation. When students are allocated University accommodation they are required to sign an Occupancy Agreement. This states that the accommodation is for their sole use whilst they are undertaking a full time course here and they are not permitted to sub-let the accommodation to anyone else.

A team of Student Wardens are employed by the University and live in the student Residences alongside the students. The Wardens are part of the Accommodation Team and work closely to address any issues which may arise in both a proactive and reactive way. Wardens immediately report back to the University if they became aware of any potential sub-letting.

The University does not place any students who apply for our accommodation in accommodation managed by private landlords or accommodation agencies. We do not recommend any private accommodation providers to any students.

From January 2020 the University has ensured that all student placements, arranged by the University, are with providers who comply with the Modern Slavery Act 2015 and that the provider operates a safe environment for the student to work. This is covered as part of the due diligence element of the placement.

5.4 *Representatives and educational establishments we do business with*

We undertake due diligence on representatives and educational establishments before we do business with them and this will be expanded so that we gather information about their approach to slavery and human trafficking.

International agents are appointed to work on behalf of Teesside University to cover the geographic areas required in the recruitment of international students. The spread of these agents is such that it enables the University to access more markets. In addition they can travel more easily in certain areas, and have a better understanding of the local culture and market perception. All agents undergo an application and vetting process. Once they have passed the due diligence checks and are suitable to represent the University all agents' sign up to the International Student Recruitment Agency Agreement. Within these contractual terms is a clause which covers Modern Slavery.

All agents are reviewed twice a year and the University is required to provide the list to UKVI annually in line with our sponsor responsibilities. Agents are also communicated with on a regular basis. This ensures that they are up to date with the

latest regulations from UKVI and the offer at Teesside University. Whilst in-person visits were paused during the pandemic they are now resuming.

The University presented to its overseas office staff in June 2022 a Modern Slavery Update which the overseas team also incorporate in their Agents reviews.

6. Our Plans for the Future

In respect of our supply chain, the University plans to continue to build on the steps already undertaken to reduce the risk of Modern Slavery occurring and continue to bring contractual clarity to our expectations of suppliers with regard to the Act.

We will continue to perform risk overviews through the Project Initiation Document (PID) to identify high risk procurement projects in our supply chain where Modern Slavery poses the most risk. Once identified an individual action plan can be developed to mitigate risks within procurement projects.

We are keen to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and are committed to raising awareness amongst all staff about this. In particular we will continue to stress the need for operational practice to match the expectations in this area. We will continue to engage widely with staff involved in procurement projects on the issue during the coming year and will ensure the additional training identified is completed by relevant staff within key areas.

We will continue to promote to all staff Anti-Slavery Day and ensure the identified training can be accessed.

Additional guidance on slavery and human trafficking for internal purchasers and staff involved in purchasing from high risk categories will continue to be prioritised in 2023.

We will continue to review annually the University's standard terms & conditions to ensure that the section relating to Modern Slavery is robust and meets current best practice.

To demonstrate Teesside's commitment to tackling modern slavery and human trafficking, a briefing will be provided to the University's Agents and Partners, with updates on current guidance and the relevant sections covering these areas within their agent contracts being highlighted.

We continue to communicate with our supply base to ensure that the representatives and educational establishments we are already doing business with have taken and are taking appropriate steps to eliminate slavery and human trafficking from their businesses and supply chain. Action will be taken to address any concerns we identify.

This statement has been approved by Teesside University's Audit Committee on behalf of its Board of Governors. It will be reviewed and updated as necessary or on an annual basis.

Signed on behalf of the Board of Governors



Professor Paul Croney OBE

Vice-Chancellor and Chief Executive

25 November 2022