

Manchester Metropolitan University

Modern Slavery and Human Trafficking Statement (2024)

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Manchester Metropolitan University's modern slavery and human trafficking statement for the financial year ending 31st July 2024.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The University is committed to preventing modern slavery and human trafficking in any part of its business or supply chains.

This is our tenth annual statement under the Act and provides an overview of our continuing commitment and development in this area.

Structure and Business

Manchester Metropolitan University is one of the largest campus-based universities in the UK, with a total student population of around 43,000, over 5,100 employees and an annual turnover of £461m in the 2023/24 financial year.

Our campus is designed around the student experience and is based in the heart of Manchester, the UK's most popular student city.

The University is arranged into:

- 4 Faculties - providing specialist learning and teaching, and
- Professional Services - providing a wide range of services and support to students and academic colleagues.

More information about us and our activities is available here: mmu.ac.uk

Supply Chains

In 2023/24 the University used over 3,671 suppliers to provide supplies, services, and works, ranging from micro and small medium enterprises (SMEs) through to large and multi-national enterprise organisations.

Business size & type:

38% of our suppliers are classed as micro-organisations or SMEs, and 62% are classified as Large or Enterprise organisations.

Geographical distribution:

26.8% of our suppliers are based within Greater Manchester,

38.3% are based within the North-West of England,

88.7% are based in the UK, and

11.3% are non-UK based.

Policies and Procedures

The University provides clear direction on its approach to the risk of modern slavery in its business and supply chains through a number of policies and procedures:

Modern Slavery Act Policy – has a clear purpose and provides guidance on roles and responsibilities, compliance, training and communication.

Our Procurement Strategy and Purchasing Procedures identify the standards and principles we require our suppliers to commit to and evidence as part of our supplier selection process, including modern slavery, health & safety, sustainability, and our commitment to pay the Living Wage Foundation accredited rate.

Risk Assessment and Management

The University recognises the risk that modern slavery increases as a supply chain extends and have identified four distinct levels:

1. our own operations, workforce and internships
2. our tier 1 (direct) suppliers
3. our tier 2 (indirect) suppliers
4. our international partnerships

1. Our own operations and workforce

In respect of the University's own operations and workforce, recruitment processes are robust and fair with right to work checks carried out before candidates can commence their employment using identify verification systems.

The University recognises that in the case of internships and placements there is a potential risk of exploitation due to a likely lack of student experience in the workplace.

To avoid this, the University has an Unpaid Work Experience Policy that ensures that those taking part are treated equally and remunerated in line with the Living Wage Foundation accredited rate.

The University manages its operations and workforce risk through several key HR policies which are relevant to the Modern Slavery Act. These policies include:

- **Whistleblowing Policy**

Encourages employees to disclose all forms of wrongdoing, including criminal activity (including modern slavery), safeguarding or failure to comply with rules and regulations without fear of reprisal.

- **Respect at Work and Study Policy**

Ensures that all members of the University community are protected from incidents of harassment, sexual misconduct, bullying and/or victimisation.

- **Equality and Diversity Policy**

Details how the University takes a zero-tolerance approach to discrimination, victimisation,

harassment, or any other prohibited conduct of any kind by any party.

2. Our tier 1 (direct) suppliers

The University directly procures supplies, services and works from a wide range of suppliers across many categories and is committed to acquiring these in a responsible manner.

Within our procurement processes, suppliers are required to demonstrate their commitment to the Modern Slavery Act as well as highlighting any areas of potential risk that may require further investigation/action.

Before appointing tier 1 suppliers, the University assesses the risk of modern slavery being present in the supply of the works, goods or services and challenges the supplier to identify, remove or reduce the risk wherever possible.

Key risk areas include agency staff, services, construction and IT equipment.

- **Agency staff**

The University uses a range of external agencies to provide temporary staff to support its operations. Agencies are required to have robust employment status and identification checks for the temporary workers who do not go through the University's own employment checks, to ensure compliance with the Modern Slavery Act.

- **Services**

The University uses a range of suppliers to deliver services such as accommodation cleaning, grounds maintenance and waste removal. Often the work is seasonal or delivered over a short period of time and suppliers are required to have robust employment checks to ensure compliance with the Modern Slavery Act.

- **Construction**

When undertaking the procurement of building works, suppliers are asked specific questions during the tender process about their employment practices and the use of labour, to demonstrate compliance with the Modern Slavery Act.

- **IT**

The University is a member of [Electronics Watch](#) an international independent monitoring organisation that assists public sector buyers to meet their responsibility to protect the human rights of electronics workers in global supply chains.

IT hardware is purchased via consortia frameworks that require suppliers to commit to support Electronics Watch monitoring.

3. Our tier 2 (indirect) suppliers

Many of our suppliers have supply chains of their own and as part of the procurement and contract management process, we encourage our suppliers to:

- map their own supply chains and provide evidence of how they risk assess their supply chains.
- take appropriate actions where risks are identified.
- inform the Contract Manager of any findings of modern slavery identified in their organisation or in their supply chain.

4. Our international partnerships

The University has numerous academic partnerships with prestigious universities, colleges and academies around the world, and we are committed to ensuring that our expectations around modern slavery in our own organisation is reflected in our international partnerships.

Training and Awareness

Training is a way of developing awareness and understanding of modern slavery and human trafficking amongst colleagues.

To support training the University has adopted the Slave Free Alliance e-learning module, which enables a higher level of understanding of how the risks of modern slavery and human trafficking may appear in our supply chains.

Effectiveness

Our contracted suppliers are vetted to ensure they are committed to supporting the principles

of the Modern Slavery Act and have appropriate measures and policies in place.

In 2023/24, we spent over £100,000 with 217 contracted suppliers. Of these, 89 suppliers with a turnover exceeding £36 million were required to publish a statement under the Modern Slavery Act. We found all 89 suppliers to be compliant, as each had published a modern slavery statement.

Of the 105 suppliers with a turnover below £36 million, 35 voluntarily published a Modern Slavery Statement and 23 were international suppliers and are not covered by the UK Modern Slavery Act.

Achievements 2023/24

During the last year we have achieved several positive outcomes in the fight against modern slavery and human trafficking, including:

- Renewed membership of [Slave Free Alliance](#) (part of Hope for Justice).
- Maintained active membership with [Electronics Watch](#).
- Delivered an introduction to modern slavery to over 90 colleagues.
- Further developed our internal [modern slavery](#) resources and information
- Completed an internal audit of our compliance with the Modern Slavery Act.
- Developed a [Modern Slavery Supplier Code of Conduct](#) with the Slave Free Alliance.

Future Plans

Each year we reassess the effectiveness of the actions we have taken over the previous 12 months to help combat modern slavery or human trafficking and use this assessment to develop our future plans.

In 2024/25 the University will:

- Deliver the actions identified in the 2023/24 internal audit report.
- Incorporate our Modern Slavery Supplier Code of Conduct into supplier appointments.
- Continue to identify modern slavery risks within our supply chains and act to remove

these where possible, with the support of our suppliers and the Slave Free Alliance.

- Review our Modern Slavery Act Policy and associated policies.
- Continue to raise the profile of modern slavery through training and awareness with stakeholders.
- Review and update our Recruitment and Selection Policy.

A handwritten signature in black ink, appearing to read 'A. H. [unclear]'. The signature is written in a cursive style.

Director of Finance

Date: 22 November 2024

**Approved by the University's Board of
Governors**

Date: 22 November 2024