

Bath Spa University Statement on Modern Slavery and Human Trafficking for the year ended 31 July 2022

Bath Spa University is proud of its vision to be a leading university in creativity, culture and enterprise. Underpinning this vision is a principle to act ethically; the University is therefore committed to establishing practices to combat slavery and human trafficking.

The University is working towards obtaining Fairtrade University status; increasing the range of products bearing the Fairtrade Mark that are sold by the University ensures that the relevant parts of its supply chain are more likely to meet Fairtrade standards that protect workers' rights and guarantee payment of a minimum price.

Our structure

Bath Spa University is a higher education corporation established pursuant to the Education Reform Act 1988. It is also an exempt charity, registered with and regulated by the Office for Students. The University's principal place of business is at Newton Park, Newton St Loe, Bath BA2 9BN. The University has approximately 900 employees, the majority of which are based in the United Kingdom.

The University has three subsidiary companies, Bath Spa U Limited, Bath Spa Venues Limited and Summix LRB Developments Ltd. The annual turnover of the consolidated accounts of the University is in the region of £99.8m.

The University comprises of seven academic schools: Bath Business School; Bath School of Art, Film and Media; Bath School of Design; School of Education; School of Writing, Publishing and the Humanities; Bath School of Music and Performing Arts; School of Sciences. In addition, the University operates the delivery of academic programmes at Bath Spa University London.

Several professional services departments exist to provide services to the students and the University as a whole. These include Human Resources, Academic Planning, Student Experience, Finance, IT Services, Estates, External Affairs, Governance, Legal & Compliance, Research and Graduate Affairs. Within the Finance department, the procurement function supports academic schools and departments in helping to ensure the University obtains value for money in all the goods and services it purchases, in-line with the University's Financial Regulations and The Public Procurement (Amendment Etc.) (EU Exit) Regulations 2020.

Our Policies

We have a zero tolerance to slavery and human trafficking. The University maintains policies relating to procurement, sustainability, equality, wellbeing and diversity which together form a robust institutional effort to combat slavery and human trafficking. Where relevant, our policies extend to our suppliers in expectations of adherence to external regulations and University principles.

The University's procurement policies are concerned with adherence to the conditions outlined elsewhere in this statement and in ensuring due diligence, and include a sustainable procurement policy.

The University is committed to conducting its business with honesty and integrity, and it expects all staff to maintain high standards. Staff are encouraged to raise concerns of a public interest or make a public interest disclosure as part of the Whistleblowing Policy which is designed to allow concerns of a public interest arising in relation to the University to be raised, investigated and where appropriate, acted upon.

Our supply chains

To ensure all those in our supply chain and contractors comply with our policies, we have in place a supply chain compliance programme; wherever possible our supply chain is made up of suppliers who are registered under framework agreements such as Southern Universities Purchasing Consortium, Crescent Purchasing Consortium, Crown Commercial Services and Health Trust Europe.

Consultancies and construction work are also lodged under framework agreements to ensure compliancy with legislation.

Due diligence processes for slavery and human trafficking

Supply chain management from the consortia is routine throughout the contractual term and staff are encouraged to manage contracts throughout the term to ensure value for money. On the occasions where a framework agreement cannot be used the University carries out due diligence on all new suppliers prior to placing a purchase order, as standard, this includes a question pertaining to modern slavery compliance. Further engagement with suppliers, including with the University's educational partners, is subject to review dependent on this confirmation step and the University's standard contractual clauses explicitly require adherence by all suppliers to the Modern Slavery Act 2015.

The University works to identify and assess potential risk areas within its supply chains, monitor and mitigate any identified risk and to protect whistle-blowers raising concerns.

Supplier adherence to Bath Spa University values and ethics

To ensure all those in the University and its supply chain and its contractors comply with our policies and procedures the University has put in place a supply chain compliance programme. This normally consists of procurement procedures, contract reviews and renewal of due diligence at the point of any renewal.

The University is committed to sustainable procurement and plans to implement ISO 20400 by 2025; a key part of this is the undertaking of a review of the University's current procurement framework.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in University business and its supply chains, the University offers procurement training to all relevant staff.

The process all University staff must follow, in the engagement of a new supplier and inclusion of querying the suppliers' efforts and steps taken to ensure compliance with the Act, acts as an engagement tool to ensure that staff access the resources made available in the provision of compliance.

The publication of this statement and the University's approach to ensuring compliance with the Act is shared with staff via news and updates in line with the publication of the University's annual report and financial statements.

Further Steps

Going forward, the University's Sustainability Group will renew its efforts to work closely with colleagues across the University including Procurement, Finance and Estates functions to monitor higher risk areas within the University's supply chain.

During the 2022-23 financial year, we aim to focus on the following areas:

- Continue to work towards obtaining ISO20400 sustainable procurement certification by 2025. The certification process includes supply chain due diligence and contract conditions to be further enhanced.
- Move to a 'Responsible Procurement' approach that will consider the impact of the Goods and Services we choose, reduce the risks from suppliers, and enhance the monitoring and reporting of its supplier's sustainability actions, including Modern Slavery.
- We will continue working closely with our key suppliers, SUPC Responsible Procurement Group and organisations such as Electronics Watch.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the University's slavery and human trafficking statement for the financial year ending 31 July 2022. It was approved by the Board of Governors of Bath Spa University on 15 December 2022.



Jonathan Glasspool

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Chair of the Board of Governors

Bath Spa University