

**Bath Spa University Statement  
on Modern Slavery and Human Trafficking  
for the Year Ended 31 July 2025**

Bath Spa University is proud of its vision to be a leading university in creativity, culture and enterprise and, through the delivery of Strategy 2030, the University's purpose is to *"challenge our students and staff to realise their talent and thrive, for their own benefit and for the wider good. By doing this we will think and make the world better"*. 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 a Fairtrade University. 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, United Kingdom. The University has approximately 1400 employees.

The annual turnover of the consolidated accounts of the University in 24/25 was over £260m.

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 (Hackney and Canary Wharf).

Several professional services departments exist to provide services to the students and the University as a whole. These include Academic Planning, Student Experience, Centre for Innovation and Knowledge Exchange, Research and Enterprise, Human Resources, Finance, IT Services, Estates and Services, and Governance, Legal & Compliance.

Within the Finance department, the procurement function supports these schools and departments in helping to ensure the University obtains value for money for the goods and services it purchases, in-line with the University's Financial Regulations and the Procurement Regulations.

### **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. Suppliers are assessed during the procurement process, and above procurement regulation thresholds the government standard assessments are carried out during selection, as well as due diligence steps during contract award and supplier onboarding. Wherever possible our supply chain is made up of suppliers who are registered under framework agreements from public sector purchasing consortia to ensure robust checks are undertaken and compliant with legislation.

Supplier spend is categorised using standard Higher Education Procurement commodity coding to improve reporting and ensure a risk-based approach. During 2024/25 the majority of suppliers setup on our Finance System have been categorised.

### **Due Diligence Processes for Slavery and Human Trafficking**

Supply chain management from the consortia is routine throughout the contractual term and staff are required 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 onboarding, 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. The University takes a risk-based approach to better understand its supply chains and to prioritise and target actions accordingly.

### **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 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 work within the framework of ISO 20400, with full implementation in 2028.

### **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, IT, HR, Academic Planning, the Centre for Educational Partnerships, and Estates functions to monitor higher risk areas within the University's supply chain.

During the 2025-26 financial year, we aim to continue our focus on the following areas:

- Work towards obtaining ISO20400 sustainable procurement certification with full implementation in 2028. The certification process includes supply chain due diligence and contract conditions to be further enhanced.
- Moving 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.
- Continue working closely with our key suppliers, purchasing consortia, HEPA and SUPC Responsible Procurement Groups, and organisations such as Electronics Watch.
- To develop a specific Modern Slavery Policy and further develop the University's approach to training staff on the subject, prioritising the procurement department.
- Improvement of our supply chain reporting to ensure a risk-based approach, as well as engagement with our supply base and partners including their approach to subcontracting.

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 2025. It was approved by the Board of Governors of Bath Spa University on 10 December 2025.



Jonathan Glasspool

Chair of the Board of Governors

Bath Spa University