

# **Bath Spa University**

## **Statement on Modern Slavery and Human Trafficking**

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 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.

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 2018.

### **Our structure**

Bath Spa University is a higher education corporation established pursuant to the Education Reform Act 1988. It is also an exempt charity regulated by the Office for Students. The University's principle place of business is at Newton Park, Newton St Loe, Bath BA2 9BN. The University has approximately 1,000 employees, the majority of which are based in the United Kingdom.

The University has two subsidiary companies, Bath Spa U Limited and Bath Spa Venues Limited. The annual turnover of the consolidated accounts of the University is in the region of £83,000,000.

The University comprises of three distinct academic units: Bath Spa School of Art and Design (BSAD); The College of Liberal Arts (CoLA); and The Institute for Education (IfE). Sitting within each of these units are departments and fields of study such as the Bath Business School, which operates as a field within CoLA.

Several professional service departments exist to provide services to the students, the academic units, departments and fields. These include finance, human resources, student services, academic services, estates, compliance, international relations, marketing, legal and others.

Within Finance there is a specialist Procurement office, which deals with the University's supplier implementation; within Estates, there is a Sustainability team, which leads on Supplier engagement and review in relation to compliance with the Act.

### **Our supply chains**

Our supply chains include: suppliers registered under Government procurement contracts, including Crown Commercial, The Energy Consortium, Estates contractors, suppliers of ICT equipment and related services and other professional advisors. The University also procures through a number of Frameworks, including the Southern Universities Procurement Consortium (SUPC).

**Due diligence processes for slavery and human trafficking**

As a first step, all suppliers to the University are asked to confirm that they comply with the Modern Slavery act. Further engagement with the suppliers is subject to review dependent on this confirmation step.

The University works to identify 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 consists of procurement procedures, contract reviews and renewal of due diligence on contract 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 an understanding of the risks of modern slavery and human trafficking in University business and its supply chains, appropriate staff will be trained.

The process all University personnel 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 encourage staff to 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 financial statements.

**Steps taken for 17/18 and 18/19**

The University is developing a dedicated Compliance Risk Register to complement the University Strategic Risk Register. This is a cross departmental initiative which will receive reports from the various corporate legislative requirements, to include risk assessment and review of the University’s responsibilities within the Act.

A small working group, led by Sustainability in conjunction with Compliance and Procurement meets no less than twice a year to feed into the Compliance Risk Register

Signature of the Vice Chancellor of Bath Spa University:



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