

Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction

Middlesex University Higher Education Corporation (MDX) is committed to carrying out procurement of goods and services in an environmentally, socially, ethically and economically responsible manner and to entering into agreements and contracts with suppliers that share and adhere to this commitment.

Modern slavery is a crime and a violation of fundamental human rights. It takes 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 in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2023

Organisational structure

The Middlesex University estate (MDX) is a large university based in London that has campuses overseas, in Dubai and Mauritius. MDX comprises of one main teaching campus and some ancillary buildings situated in the North London area. MDX also shares space at one teaching hospital and at the West Stand at StoneX Stadium, home of Saracens Rugby. MDX has outdoors sports facilities on-campus and a Sports ground off-campus, which is shared with the local community in north London. MDX is heavily involved in developing the estate and further building in conjunction with the London Borough of Barnet on their land is planned in the future.

We have four Faculties: Faculty of Arts and Creative Industries; Faculty of Business and Law, Faculty of Health, Social Care and Education and Faculty of Science and Technology. We are leaders in professional, creative and technical education with career-focused and skills-based courses. We have an outstanding campus where students have access to revolutionary technology to develop their skills, including our new cutting-edge centre for simulation-based learning with tech like AR and VR. We offer students choice over what and how they learn so their education is personal to them and their ambitions. Students receive personalised academic and practical support, including financial support with the cost of living.

MDX employs over 1,700 members of staff and has over 38,000 students studying on MDX courses across our global campuses and partner institutions, of which 15,000 study at our London campus (figures for 2021/22). Our students are diverse and international with over 122 nationalities represented on campus. The academic year begins with student enrolment in September and we also offer a substantial number of programmes for a January start.

MDX is recognized for the employability focus of our teaching; our commitment to the success of our culturally and internationally diverse students; the societal impact of our research, and our unique global network of students, staff, alumni and partners.

UK Subsidiary Companies

The University has two wholly owned subsidiary companies in the UK; one which supplies contract research services, consultancy and provides other products and services to commercial clients, and another which provides support staff services to the University.

Overseas Subsidiaries

The University has several overseas subsidiary companies, which are located in Hong Kong, Dubai, India, Malaysia and China, which act as local recruitment offices and support Alumni activity in the region.

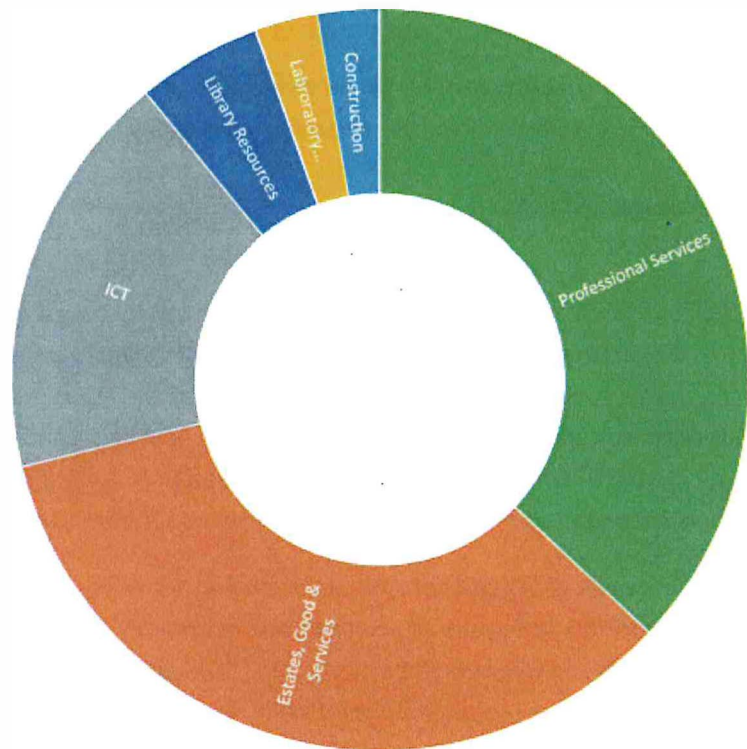
Our supply chains

Middlesex University is committed to protecting the environment and therefore requires a contractor who is able to demonstrate, support and abide by our efforts in achieving the objectives as laid out in our Environmental & Ethical policies; <https://www.mdx.ac.uk/about-us/policies>

Our main supply chain falls under the following categories:

- Professional Services
- Construction
- Estates Goods and Services
 - Cleaning
 - Catering
 - Security
 - Waste
- ICT Equipment and Services
- Laboratory Consumables and Equipment
- Library Resources

MDX Key Suppliers by category



The principal risks are:

- Manufacturing of Consumables
- Professional Services provided to the University

Other risks to consider are:

- Country Risks
- Sector Risks
- Transaction Risks
- Business Partnership Risks

Data based on 100 suppliers

Supplier Due Diligence process

The University is a member of several buying consortia, the London Universities Procurement Consortium (LUPC) being one of them, which is a non-profit professional buying organisation. LUPC has published its own Anti-Slavery and Human Trafficking Statement which sets out its position and strategy in working to prevent acts of slavery and human trafficking throughout the supply chain. The University benefits from the LUPC's affiliate membership of Electronics Watch, an independent monitoring organisation helping public sector organisations to protect the labour rights and safety of workers in global electronics supply chains. Through this affiliation, the University has access to guidance, resources and contract clauses that support responsible procurement.

At the supplier selection stage of a formal procurement, a core set of questions are asked in relation to modern slavery issues and safeguards, and the potential suppliers' responses are reviewed, scored and weighted to assess the standards they have in place. This process helps Middlesex University to make an informed decision about the supplier that is most suitable for the sourcing project.

All chosen suppliers who are subsequently onboarded are required to answer further questions on social and environmental sustainability, including their efforts to protect against modern slavery, their own vendor due diligence processes and to provide supporting evidence for their answers. Where we are satisfied that it is a supplier with whom we want to engage, we then negotiate appropriate terms with them. Adherence to local laws and regulations regarding modern slavery is a non-negotiable item.

The University has recently signed up to TISCreports. Transparency in supply chains (TISC) is a global Transparency in Supply Chains platform built to help socially responsible organisations #DoLessHarm and #DoMoreGood. With this we will be able to review our own compliance and monitor our high risk suppliers.

tiscreport.org is the World's largest Open Data Register committed to ending Modern Slavery and supply chain labour abuses, joining up Transparency In Supply Chains (TISC) reporting globally. As an open data initiative, it meets the compliance requirements of section 54 of the Modern Slavery Act 2015 of the Home Office, and was announced at the Home Office TISC event on the 21st March 2016. TISCreports exists to empower the business community in hunting down and sustainably eliminating exploitation hidden within their supply chains.

KPI's

Review and amend procurement policies following publication PPN 03/23 https://www.gov.uk/government/publications/ppn-0323-standard-selection-questionnaire-sq	Completed
Begin mapping suppliers for high risk supply chains	We have taken some action in this area and will continue to develop
Supplier Audits	Look into using TISCreports (https://tiscreport.org/) to check supplier compliance
Review of our supply chain statements (those who fulfill the criteria to publish one);	Year One: Top 20 suppliers by spend that qualify to publish a statement (achieved - 2020)

	<p>Year Two: Next 20 suppliers by spend that qualify to publish a statement (achieved - 2021)</p> <p>Year Three: Next 20 suppliers by spend that qualify to publish a statement (achieved - 2022)</p> <p>Year Four: Next 20 suppliers by spend that qualify to publish a statement (achieved - 2023)</p> <p>Year Five: 20 suppliers by spend that qualify to publish a statement (2024)</p>
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Procurement Processes

The University continues to implement the following in its procurement:

- Processes: standard contractual clauses which are being added to new contracts
- Mandatory questions added to the Standard Questionnaire (SQ) asking potential suppliers to confirm their business position on modern slavery and provide proof of their compliance
- Modern slavery has been added to the agenda for contract performance reviews

The procurement team has raised awareness among the buyers and contract managers within the University and share best practice amongst them.

The procurement team are signed up to the parliament website to receive alerts of any updates to The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, guidance has been added on the risks of Modern Slavery in the supply chain to our Procurement Training which is available to all University staff. The procurement team have attended formal training sessions so are equipped with the necessary background to pass on to other members of the University.

Future Actions

Middlesex University will continue to review its supply base and procurement processes to assess what steps need to be taken to prevent, monitor and mitigate risks.

The University will develop a systematic approach to challenge our partners, subsidiaries and overseas campuses & offices to identify high risk circumstances to further mitigate the risk of slavery and human trafficking occurring.

The University will include a Modern Slavery clause in the University Standard Terms and Conditions published on the www.mdx.ac.uk website.

The University will consult Student Union as part of the endorsement process.

The University Procurement Office will convey to other departments within the University, the responsibility they bear, to ensure compliance to the Modern Slavery Act.

A handwritten signature in blue ink, appearing to be 'MS Jones', with a horizontal line underneath.

[SIGNATURE OF SENIOR MEMBER OF BOARD OF GOVERNORS]

MIDDLESEX UNIVERSITY

Date: 18 September 2023

