

Middlesex University London

Financial Year 2021/22

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 2021.

Organisational structure

MDX is a large university based in London that has campuses overseas, in Dubai and Mauritius. We have four faculties: Arts and Creative Industries; Science and Technology; Health Social Care and Education; and Business and Law that offer a broad range of courses.

Our largest campus is located at Hendon in North London comprised of a single teaching campus in the North London area. MDX also shares space at one teaching hospital and this year we open a new facility at Stone X stadium. MDX has some outdoor sports facilities on-campus and a multi-use sports ground off-campus which is shared with the local community in North London. MDX employs over 1,700 members of staff and has over 15,000 students studying in London.

The campuses in Dubai and Mauritius are operated as Joint Ventures with local partners.

UK Subsidiary Companies

The University has a number of subsidiary companies in the UK. MU Ventures Ltd organises consultancy, contract and continuous data protection to commercial clients. MU Services Ltd provides services to other parts of the University.

Overseas Subsidiary Companies

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

Our supply chains

Middlesex University's commitment to preventing modern slavery and to protecting the environment requires us to work with contractors who are 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:

- Estates Goods and Services - 37'
 - Cleaning
 - Catering
 - Security
- Professional Services – 33%
- ICT Equipment and Services – 18
- Laboratory Consumables – 6% and Equipment
- Library Resources – 3%
- Construction – 3%

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.

MDX Key Suppliers by category

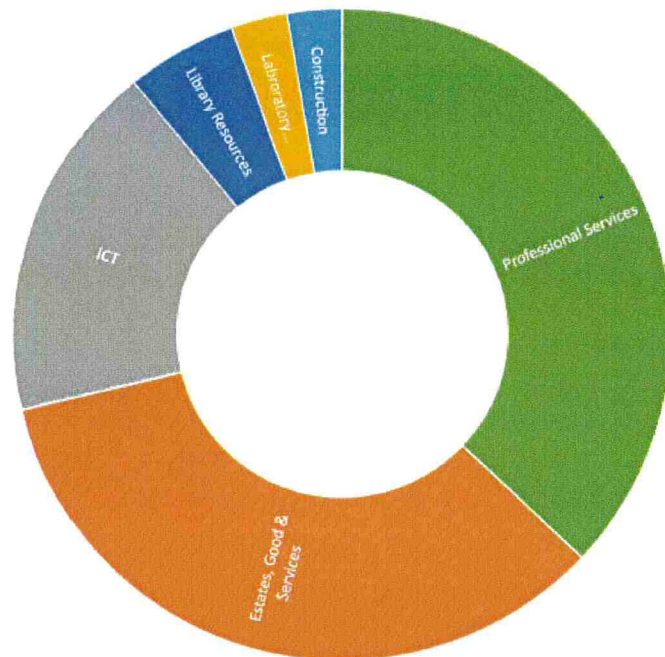


Figure 1: Data based on 100 suppliers

Supplier Due Diligence process

At the supplier selection stage, 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 contracted 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 non-negotiable item.

Modern Slavery Assessment Tool

The government developed the MSAT tool which is a modern slavery risk identification and management tool for public bodies to use to assess their own supply base for modern slavery risks.

This tool is being used to run an annual campaign where we invite of our top spend suppliers to take part to complete an assessment. Suppliers were given a 10-week period to complete the assessment which was run through Crown Commercial Services Supplier Registration site.

The scores from the completed assessments show our suppliers scored highly in Governance & Policies and Procedures but have improvements to make in the remaining sections Risk Assessment and Management, Due Diligence, Training and KPI's.

We will in the coming months work with our suppliers using the MSAT evaluator guidance to focus on the suppliers whose final score was below standards.

KPIs

Middlesex university will run the MSAT campaign on an annual basis and the first KPI measurement for this will be the identification of relevant suppliers to be invited to respond to the campaign. It is not compulsory to respond to our request so our obligation is to identify the relevant suppliers in our supply chain and encourage their participation.

Year One: Top 20 suppliers by spend (30 achieved - 2020)

Year Two: Next 20 supplier by spend (achieved - 2021)

Year Three: Next 20 suppliers by spend (17 achieved - 2022)

Year Four: Next 20 suppliers by spend (2023)

Middlesex University has now identified the top 60 suppliers in our supply chain and invited them all to join an MSAT campaign. Over 50% of these suppliers have responded and have been scored in accordance to the assessment criteria.

The second KPI measurement is the 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)

Year Two: Next 20 suppliers by spend that qualify to publish a statement (achieved - 2021)

Year Three: Next 20 suppliers by spend that qualify to publish a statement (achieved - 2022)

Year Four: Next 20 suppliers by spend that qualify to publish a statement (2023)

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 (Transparency in Supply Chains) Bill.

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.

Middlesex University will annually run a MSAT campaign to monitor improvements in our existing suppliers' processes and also inviting new suppliers to complete and assessment.

The University will develop a systematic approach to challenge our partners, subsidiaries and overseas campuses and 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 department will endeavour to identify all other responsible departments within the University to achieve buy-in to their responsibilities to the Modern Slavery Act.



[SIGNATURE OF THE CHAIR OF THE BOARD OF GOVERNORS]

MIDDLESEX UNIVERSITY

Date: