

# Financial Year 2018/19

## 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 July 2019.**

#### **Organisational structure**

Middlesex University is a large university based in London that has campuses overseas, in Dubai, Mauritius and Malta. We have three main faculties; Arts and Creative Industries, Science and Technology and Professional and Social Sciences that offer a broad range of courses.

Our flagship campus is located at Hendon in North London comprised of one main teaching campus and several other buildings situated in the North London area. MDX also shares space at one teaching hospital and the Allianz Park 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. Middlesex University employs 1,800 members of staff and has 20,000 students at its main campus in North London, 5,000 students studying at our campuses in Dubai, Mauritius and Malta and a further 16,000 students studying with academic partners in the UK and overseas.

#### **UK Subsidiary Companies**

The University has a wholly owned subsidiary company in the UK which organises consultancy, contract and continuous data protection to commercial clients.

#### **Overseas Subsidiaries**

The University has several overseas subsidiary companies, which are located in Hong Kong, Dubai, China, India, Malaysia and Mauritius, 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

- Merchandise
- ICT Equipment and Services
- Laboratory Consumables and Equipment
- Library Resources

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

### **Current Actions**

Within the last 12 months we have successfully contacted our top spend suppliers and obtained copies of their Modern Slavery Statements where applicable. We continue to apply due diligence checks with new suppliers who are continually being added to our supplier base.

In addition 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

The University will map out a process to identify specific suppliers in high risk areas to perform additional checks in order to mitigate the risk of slavery and human trafficking taking place in the supply chain.

The responsibilities and obligations to the Modern Slavery Act will be mapped out for;

- Staff
- Suppliers
- Partners
- Agents

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](http://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.

The University will develop a series of KPI measures related to anti-slavery and report on these as part of the annual Modern Slavery statement.

A handwritten signature in black ink, appearing to read 'G. Proudler', written in a cursive style.

GERALDINE PROUDLER, CHAIR OF THE BOARD OF GOVERNORS

MIDDLESEX UNIVERSITY

Date: 3 October 2019