

# Slavery and Human Trafficking Statement

## 1) Introduction

- a) This statement is made by Leeds Trinity University regarding section 54(1) of the Modern Slavery Act 2015.
- b) Turnover exceeding £36m was reported in our Financial Statements of year ended 31<sup>st</sup> July 2024. This is the university's fifth Modern Slavery and Human Trafficking Statement.
- c) The statement demonstrates our commitment to tackling issues of slavery and trafficking, by setting out the steps that we have taken during the review period, and those we intend to take, that address the risk of slavery and human trafficking taking place in our workplace, or in our supply chains.

## 2) Our organisation's structure, business, and supply chains:

- a) Leeds Trinity University is a higher education institution, with a student enrolment of 13,630 (2022-23) and 800 employed staff in 2023-24.
- b) Influenceable expenditure on goods and services is c.£19.6m.

## 3) The parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk.

### a) Staff

- I. Our Whistle-blowing policy allows and encourages staff to use internal mechanisms for reporting any malpractice, illegal or unethical practise which could include abuses of human rights, including modern slavery and human trafficking.
- II. Our Equal Opportunities policies cover recruitment and relationships with fellow staff, students, and other businesses. Breaches of policy set in motion our Grievance Procedure which may lead to disciplinary proceedings.
- III. Our Recruitment policy ensures all staff have the right to work in the UK.

### b) Students

- I. The risk of students experiencing modern slavery or human trafficking through direct contact with the University is extremely low, though we acknowledge that students may become aware of such instances whilst living locally. Our intranet holds a repository of resources to help students report any concerns

and our staffed Student Support Office, and counselling services provide support for student wellbeing.

- II. Where students are on apprenticeships or work placement with an employer, there is due diligence process in place to ensure all employer workplaces as an appropriate environment for our students.

**c) Supply chain**

- I. Our supply chain has been identified as the area of highest risk in terms of possible occurrences of modern slavery and human trafficking, though.
  - II. Our influenceable expenditure was £19.6m using 844 different suppliers in year ending 31st July 2024.
  - III. 56% of expenditure has been caught by the Public Contracts Regulations 2015 making it mandatory for applicant suppliers to have measures in place that detect slavery and human trafficking issues.
  - IV. 52% of expenditure has been made via framework agreement.
- V. Most of the remaining expenditure is attributable to IT systems or software and Professional Services, where suppliers are predominantly SME, and assessed to have short supply chains.

**4) Our current policies, relevant to slavery and human trafficking issues:**

- a) Recruitment and Selection Policy
- b) Code of Research Conduct and Ethics
- c) Dignity at Work and Study Policy
- d) Equality Diversity and Inclusion Policy
- e) Ethical Investment Policy
- f) Fraud Policy
- g) Anti-Bribery Policy
- h) Whistleblowing Policy
- i) Student Charter
- j) Student Conduct and Discipline Code
- k) Financial Regulations
- l) Code of Conduct for Suppliers

**5) Due diligence processes in relation to slavery and human trafficking in its business and supply chains.**

- a) Our business policies are reviewed and updated regularly with a review cycle for each policy.

- b) As supply chain is identified as the highest area of risk, our Head of Procurement is the appointed lead for diligence, planning and stakeholder engagement.
- c) We analyse expenditure to determine our key suppliers and ensure they comply with section 54(1) of the Modern Slavery Act 2015
- d) We are members of the North Eastern Universities Purchasing Consortium Ltd (NEUPC), one of six UK Higher Education purchasing consortia established to deliver and manage a wide range of collaborative framework agreements within the higher and further education sector. Since 2017, it has been mandatory for NEUPC framework suppliers to perform in the NETPositive Supplier Engagement tool, used to regularly monitor, review, and ensure continuous improvement to combat slavery and human trafficking in supply chains.
- e) Wherever it is appropriate to do so, we direct our purchasing via such framework agreements that will additionally include relevant clauses to address the risks of slavery and human trafficking (for example, Electronics Watch, and Ethical Trade Initiative).

**6) The training and capacity building about slavery and human trafficking available to our staff:**

- a) We are represented at The Higher Education Procurement Association's (HEPA) National Responsible Procurement Group by NEUPC. We participate in NEUPC's regional Responsible Procurement Group which provides us with training about slavery and human trafficking issues.
- b) We have access to relevant HEPA on-line training modules.
- c) We are invited attend relevant events and conferences organised by HEPA and NEUPC

**7) The steps we intend to take, that address the risk of slavery and human trafficking taking place in our workplace, or in our supply chains:**

In advance of our next statement, we will continue to

- a) Review existing workplace policies, updating and implementing new where appropriate.
- b) Implement Procurement Strategy and Policy that makes explicit our commitment to addressing the risks.
- c) Embed a slavery and human trafficking risk assessment in our procurement procedures.

- d) Update our template contract document suite to ensure relevant clauses are explicit and robust.
- e) Provide our Sustainability Champions Group with training on responsible procurement and how we address the risks, supporting development of the University Sustainability Strategy and Action Plan.
- f) Measure and publish our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains, particularly our findings regarding our key suppliers.

**This statement was approved by the University Executive Board**