



## MODERN SLAVERY STATEMENT

### Introduction

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.

St Mary's is 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 the University's modern slavery and human trafficking statement for the year ending 31 July 2024.

### About the University

St Mary's University is a higher education institution that has approximately 5,000 students and approximately 1,000 staff. The main campus is in Strawberry Hill with other buildings used for office, commercial, and teaching use within the Twickenham area.

The University's turnover for 2023/2024 was £58.8m. The University has two subsidiary companies, Strawberry Hill Enterprises Limited. Neither of these has a turnover in excess of £36m so are not required to produce a modern slavery statement.

The University has established collaborative partnerships with other institutions in a number of countries including Australia, France, Italy, Greece and the USA.

St Mary's has demonstrated its wider commitment to addressing the complex issues around Modern Slavery by setting up a Centre for research on modern slavery, the Bakhita Centre for Research on Slavery, Exploitation and Abuse, to encourage learning and engage in impactful research on this subject.

### Our policies on modern slavery and human trafficking

St Mary's has a zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains and to raising awareness of these issues across the University, with suppliers, and the wider community.

St Mary's complies with all applicable employment law relating to employee terms and conditions, including pay. The University has an anti-slavery and human trafficking policy and it also has the following supporting policies:-



- Equality and Diversity Policy Statement and Code of Practice.
- Public Interest Disclosure Policy through which staff can report any concerns about suspected slavery and trafficking.
- Recruitment Policy and Procedure, incorporating employment checks such as right to work and disclosure requirements for the relevant roles.
- Anti-Bribery Policy.

These policies apply to all employees, contractors, sub-contractors, and agency staff.

#### Due diligence processes for modern slavery and human trafficking

##### Working Group

As part of our initiative to identify and mitigate risk in this area the University will establish a Modern Slavery working group consisting of representatives with responsibilities covering the entire University. The working group has responsibility for:

- Receiving information about the Act, including Government and legal guidance and disseminate this to staff.
- Co-ordinating the steps that the University will take to combat modern slavery and human trafficking.
- Arranging relevant training for staff.
- Preparing anti-slavery and other corresponding policies for publication on the University's website.
- Reporting to senior management on the actions taken and their outcomes.
- Arranging for the preparation and publication of the annual statement as soon as reasonably practicable after the financial year end.

#### Identified Risks and mitigation actions

##### Supply chains

Our supply chains include;

- Estates/Facilities Supplies & Services
- ICT Equipment & Services
- Building Works/Construction
- Catering Supplies
- Stationary & Office Equipment
- Books & Periodicals
- Recruitment Agency Services

The University supply chain is wide and diverse. The following mitigation is in place or planned:-

##### Invitation to Tender

All Invitations to Tender forms carry mandatory pass/fail Pre Qualification Questions (PQQ) including Modern Slavery Act 2015 compliance. Bids that fail the PPQ stage are disqualified from taking any further part in the tender process.



**St Mary's**  
**University**  
**Twickenham**  
**London**

#### **Purchasing Consortium membership**

The University is a member of the Southern University Purchasing Consortium (SUPC). The University uses the SUPC framework agreements and other purchasing consortia for its purchasing requirements and plans to continue and expand this use. The procurement team will continue to work with SUPC and others on sustainable and ethical policy guidance.

#### **Supply Chain**

As part of our normal procurement policies and procedures, we vet suppliers to ensure they comply with the relevant legislation.

The University has undertaken a supply chain mapping exercise to identify, assess and monitor potential risk across all areas. The University has identified the following supply chain categories as high priority: 1) Construction/Building works 2) Catering supplies 3) ICT equipment. Further work is being carried out to ensure that all Suppliers for these categories publish their Modern Slavery Statement where required.

#### **Agency and Other staff**

Agency staff, self-employed contractors and consultants are recruited using regulated processes and through established and accredited sources and framework suppliers (e.g. SUPC).

This statement has been approved by the Finance and Resources Committee on behalf of the Board of Governors of the University on 20 January 2025.