

## **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 2020.**

#### **Organisational structure**

MDX 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 and our Institute for Work Based Learning 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. MDX employs over 1,800 members of staff and has over 19,000 students studying in the UK.

#### **UK Subsidiary Companies**

The University has two wholly owned subsidiary companies in the UK. Services provided include consultancy, contracts and continuous data protection to commercial clients.

#### **Overseas Subsidiaries**

The University has several overseas subsidiary companies, which are located in Hong Kong, Dubai, 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:

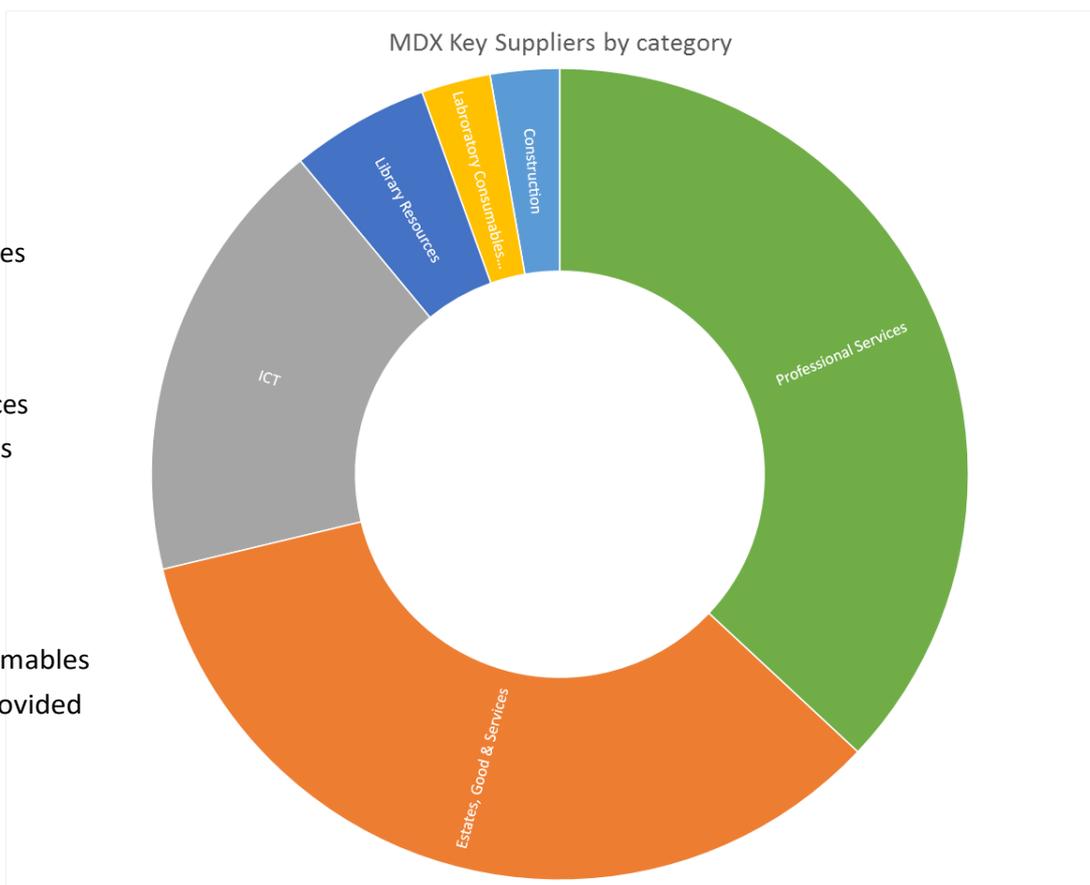
- Professional Services
- Construction
- Estates Goods and Services
  - Cleaning
  - Catering
  - Security
- ICT Equipment and Services
- Laboratory Consumables and Equipment
- Library Resources

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



Data based on 100 suppliers

## Current Actions

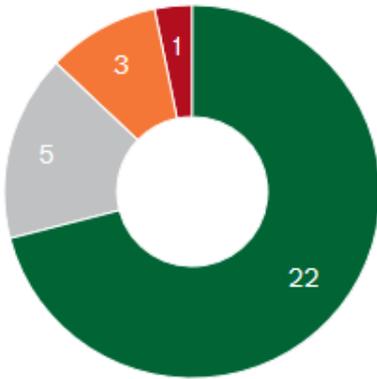
Within the last 12 months we have successfully contacted our top spend suppliers and obtained copies of their Modern Slavery Statements where applicable. We continue to apply due diligence checks with new suppliers who are continually being added to our supplier base.

## 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.

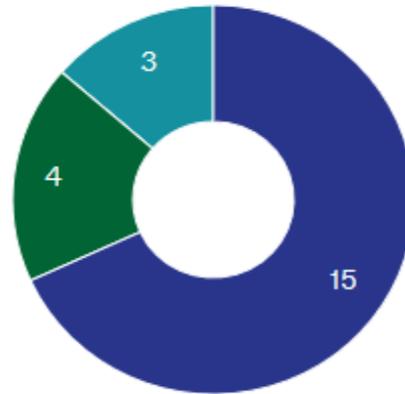
This tool was used to run a campaign in July 2020 and 31 of our top spend suppliers were invited to take part to complete an assessment. Suppliers were given a 9 week period to complete the assessment which was run through Crown Commercial Services Supplier Registration site.

### Invitations statuses



- Accepted - 71%
- New - 16.1%
- Registered - 9.7%
- Denied - 3.2%

### Questionnaire statuses



- Completed - 68.2%
- Responding - 18.2%
- Improving - 13.6%

The Invitations chart above shows that 31 suppliers were invited to complete an assessment, 22 registered and started the assessment, 3 registered but did not start the assessment, 1 declined the invitation and 5 did not register. Despite weekly reminders and sending direct emails not all suppliers were willing to take part.

The questionnaire chart shows that from the 22 suppliers that registered to complete the assessment 15 suppliers went on to complete the assessment by the set deadline, 4 were still responding and 3 were still making improvements to their responses.

## Scores

Modern Slavery Assessment V.2

### Average theme scores

15 shared completions



- [Governance](#) Green
- [Policies and Procedures](#) Green
- [Risk Assessment and Ma...](#) Yellow
- [Due Diligence](#) Yellow
- [Training](#) Yellow
- [KPI](#) Amber
- Total Score** Yellow

The scores from the 15 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 in the yellow and amber category.

### **KPI's**

Middlesex university will run the MSAT campaign on an annual basis and our KPI measurement for this will be the following completion rate:

Year One: 50%

Year Two: 60%

Year Three: 70%

### **Procurement Processes**

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.

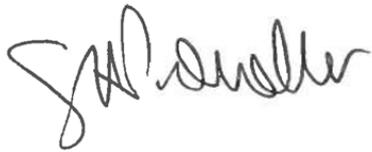
Middlesex University will annually run a MSAT campaign to monitor improvements in our existing suppliers processes and also inviting new suppliers to complete and assessment.

The University will develop a systematic approach to challenge our partners, subsidiaries and overseas campuses & 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.

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

[SIGNATURE OF SENIOR MEMBER OF UNIVERSITY COUNCIL]

MIDDLESEX UNIVERSITY

Date: 23 September 2020