

Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year beginning 1 August 2024 ending 31 July 2025 (FY24/25). 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.

Organisational structure

The Middlesex University estate (MDX) is a large university based in London that has campuses overseas, in Dubai and Mauritius. MDX comprises of one main teaching campus and some ancillary buildings situated in the North London area. MDX also shares space at one teaching hospital and at the West Stand at StoneX Stadium, home of Saracens Rugby. MDX has outdoors sports facilities on-campus and a Sports ground off-campus, which is shared with the local community in North London.

We have over 12,000 students studying on Middlesex courses at our London campus, and we employ over 1,300 staff (figures for 2023/24). The academic year begins with student enrolment in September, and there is also a substantial offering of programmes available for a January commencement.

MDX is recognized for the employability focus of our teaching, our commitment to the success of our culturally and internationally diverse students, the societal impact of our research and our unique global network of students, staff, alumni and partners.

UK Subsidiary Companies

The University has two wholly owned subsidiary companies in the UK; one which supplies contract research services, consultancy and provides other products and services to commercial clients, and another which provides support staff services to the University.

MU VENTURES LIMITED	THE BURROUGHS, HENDON, LONDON, NW4 4BT
NEWMU SERVICES LIMITED	THE BURROUGHS, HENDON, LONDON, NW4 4BT

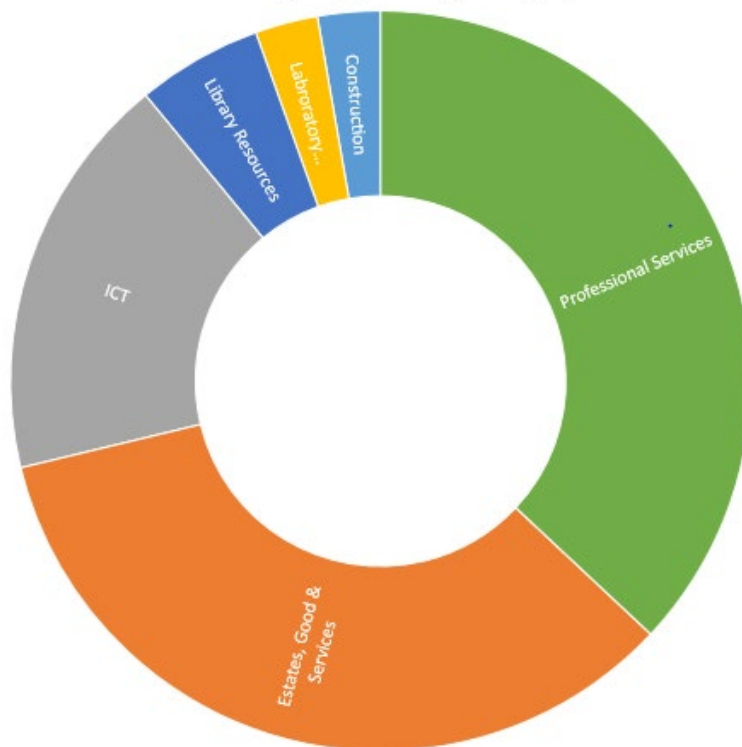
Our supply chains

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.

Our main supply chain falls under the following categories:

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

MDX Key Suppliers by category



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 120 suppliers

Our Policies and Processes

The Procurement team within the Finance Directorate has day-to-day responsibility for working toward eliminating modern slavery from our supply chains. Its policy and standard procedures include conducting due diligence risk assessments on centrally-procured goods and services.

We have appropriate processes and policies in place to mitigate the risk of modern slavery and human trafficking in our organisation and supply chains. Our procurement policy can be found on our website under policies www.mdx.ac.uk.

The University recognises that it has direct responsibilities to the people it employs. It has clear and robust procedures for checking that its staff have the right to work in the UK before they are engaged. The University also has contractual mechanisms to ensure that the same checks are done for the staff of its contractors.

Supplier Due Diligence process

The University is a member of several buying consortia, the London Universities Procurement Consortium (LUPC) being one of them, which is a non-profit professional buying organisation. LUPC has published its own Anti-Slavery and Human Trafficking Statement which sets out its position and strategy in working to prevent acts of slavery and human trafficking throughout the supply chain. The University benefits from the LUPC's affiliate membership of Electronics Watch, an independent monitoring organisation helping public sector organisations to protect the labour rights and safety of workers in global electronics supply chains. Through this affiliation, the University has access to guidance, resources and contract clauses that support responsible procurement.

The procurement team has raised awareness among the buyers and contract managers within the University, and share best practice amongst them.

At the supplier selection stage of a formal procurement, 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 onboarded, 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 a supplier reaches the threshold for which we would wish to engage, we then negotiate appropriate terms with them. Adherence to local laws and regulations regarding modern slavery is a non-negotiable item. We have recently added Modern Slavery to our New Supplier form as a mandatory compliance check.

Middlesex University is proudly accredited by the Living Wage Foundation and promotes fair wage practices throughout our employment on campus, and within its supply chains.

We have recently registered our statements dating back to 2020 on the government website <https://modern-slavery-statement-registry.service.gov.uk/>.

The procurement team are signed up to the parliament website to receive alerts of any updates to The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

KPI’s

Begin mapping suppliers for high risk supply chains	We have continued to take action in this area.
Statement Audit	Statements now added to the Government Registry
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: Top 40 suppliers by spend that qualify to publish a statement (achieved - 2021) Year Three: Top 60 suppliers by spend that qualify to publish a statement (achieved - 2022) Year Four: Top 80 suppliers by spend that qualify to publish a statement (achieved - 2023) Year Five: Top 100 suppliers by spend that qualify to publish a statement (achieved - 2024) Year Six: Top 120 suppliers by spend that qualify to publish a statement (2025) Year 7: Top 140 suppliers by spend that qualify to publish a statement (2026).

Training

To ensure a high level of understanding on the risks of modern slavery and human trafficking, guidance has been added to our Procurement Training, which is available to all University staff.

Future Actions

Middlesex University will continue to review its supply base and procurement processes to ensure the necessary steps can be taken to prevent, monitor and mitigate risks.

This statement was reviewed and approved by the Board of Governors on 8th September 2025.



[SIGNATURE OF SENIOR MEMBER OF BOARD OF GOVERNORS]

MIDDLESEX UNIVERSITY

Date:

29/09/25