





BU continues to seek assurances from suppliers and contractors of their compliance with the Act via our tender procedures (utilising Government's standard Selection Questionnaire for all above threshold procurements), by contacting key suppliers in the higher risk areas, reviewing contracts with suppliers considering the need to prevent modern slavery and having Modern Slavery Act 2015 clauses in our BU standard terms of business for procurement and other supplier contracts.

### **BU policies and due diligence processes**

BU implemented Anti-Slavery and Human Trafficking Policy and Procedures in 2016 which provide a reporting mechanism for all staff to raise concerns. The Policy and Procedures are formally reviewed and approved at least every two years and were most recently considered by the Audit, Risk and Governance Committee on behalf of the Board in November 2023. The Audit, Risk and Governance Committee has a standing agenda item to receive reports of any concerns raised under the Policy and Procedures and has oversight, along with the BU Board, of compliance with the Policy and Procedures. During the 2022/23 financial year no reports were received. The BU Whistleblowing (Disclosure in the Public Interest) Policy also protects staff, students and anyone working for BU (including casual workers, self-employed contractors, agency personnel) and allows them to raise concerns related to modern slavery or risk of modern slavery.

BU continues to mitigate the risk of modern slavery and human trafficking within its own staff community by following fair HR recruitment and selection policies and procedures. Where recruitment agencies are used, BU requires that such agencies comply with all UK legislation relating to the employment rights and welfare of candidates. BU also ensures that staff and students are able to access grievance procedures and raise concerns whether working remotely or on campus.

BU has a number of frameworks which underpin its ethical standards across all of its business activities. BU has also remained committed to playing its part in delivering the UN Sustainable Development Goals and worked to further embed the UN SDGs into all areas of BU. BU also continued to apply the following policies to ensure the procurement of goods and services took account of their social impact and to achieve ethical standards of business conduct; Sustainable Procurement Policy, Sustainable and Ethical Food Policy, Fair Trade Policy, Sustainability Policy, Sustainable IT Policy and Sustainable Construction Policy. BU also has an Ethical Investment Policy in which slavery and child labour are identified as areas in which investment is deemed inappropriate.

To ensure that BU takes full account of the economic, social and environmental implications of the goods, works and services it buys from external suppliers and organisations, BU utilises a suite of sustainability questions created by the Sustainability team which colleagues in Procurement and the Stakeholder select from when finalising the invitation to tender questions. Mandatory questions around compliance with the Act are included within the standard Central Government Selection Q



### **Training and Raising Awareness**

BU has dedicated representatives who are aware of the requirements of the Act from Legal Services and Corporate Governance, Human Resources, Procurement and Sustainability. During 2019/20 BU set up an Ethical/Responsible Procurement Group where slave labour matters were considered under the group's oversight of the implementation of the Sustainable Procurement and Ethical Investment Policies. This group held its final meeting in May 2023 and oversight of slave labour matters has now been handed over to UET and the Sustainability Committee to ensure executive oversight.

BU remains committed to working with local charities and organisations to raise awareness in the community